



**Office of Indiana
State Chemist**



EPA's Proposed Rodenticide Mitigation Measures

172nd IPRB Meeting

February 8, 2023

-Dave Scott-

EPA Proposes New Mitigation Measures for Rodenticides, Including Pilot for Protecting Endangered Species

- Released November 29, 2022
- Comments due by February 13, 2023
- 11 rodenticides, including measures to reduce potential exposures to three federally listed endangered and threatened (“listed”) species and one critical habitat.
- FIFRA requires EPA to review registered pesticides every 15 years
 - ensure that the pesticides continue to meet the statutory standard of causing no unreasonable adverse effects on human health or the environment.
- When EPA identifies unreasonable adverse effects to human health or the environment, it proposes amendments to pesticide labels to mitigate these risks.

First Generation Anticoagulants: ***Chlorophacinone, Diphacinone, Warfarin***

- **All commercial/professional structural products become RUPs.**
- **Cancel all GUPs for control of field pests.**
- **Prohibit use in cropped areas including orchards, groves, vineyards, and alfalfa.**
- **Restrict above ground applications:**
 - 1) **cannot be made directly to food or feed crops,**
 - 2) **can only be made during the non-growth (dormant) period of the crop, and**
 - 3) **must be made along fence lines, border areas, and buffer strips adjacent to the crops.**
- **Restrict below ground applications:**
 - 1) **must be made directly into the main run of the burrow, and**
 - 2) **can only be made during the non-growth (dormant) period of the crop.**
- **Require one year harvest interval for applications made to non-bearing crops.**

First Generation Anticoagulants

- Prohibit spot/scatter and broadcast applications to rangeland, pastureland, and fallow land.
- Prohibit spot and broadcast applications to turf, lawns, parks, golf courses, campsites, and other recreation areas.
- Require APF10 (half-face elastomeric respirators), along with any fit testing, training, and medical evaluations for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.
- Require chemical-resistant gloves for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets

First Generation Anticoagulants

- Revise requirement for gloves to chemical-resistant gloves, generally with a thickness ≥ 14 mils (thicker than the current standard).
- Require post-application follow-up:
 - 1) *search, collect, and dispose of carcasses,*
 - 2) *dispose spilled/kicked out bait, and*
 - 3) *report dead/dying non-target animals for RUPs packaged in ≥ 4 lbs. of bait used in fields and other non-structural use sites*
 - 4) *all other commercial/professional use applications, carcass search will be advisory.*
- Cancel reusable consumer bait stations (1lb or less) and refills.
- Limit GUPs to ready-to-use prefilled disposable bait stations ONLY.

Second Generation Anticoagulants:

Brodifacoum, Bromadiolone, Difenacoum, Difethialone

- All commercial/professional structural products become RUPs.
- Require APF10 (half-face elastomeric respirators), along with any fit testing, training, and medical evaluations for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.
- Require chemical-resistant gloves for applications of products that are meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.

Second Generation Anticoagulants:

- **Revise requirement for gloves to chemical-resistant gloves, generally with a thickness ≥ 14 mils (thicker than the current standard).**
- **Advise (recommend) for post-application follow-up:**
 - 1) search, collect, and dispose of carcasses,***
 - 2) dispose spilled/ kicked out bait, and***
 - 3) report dead/dying non-target animals for RUPs packaged in ≥ 4 lbs. of bait used in structural use.***

Bromethalin and Cholecalciferol

- All commercial/professional structural products become RUPs.
- Cancel all GUPs for control of field pests, except for bromethalin worms for moles.
- Require APF10 (half-face elastomeric respirators), along with any fit testing, training, and medical evaluations for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.
- Require chemical-resistant gloves for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.

Bromethalin and Cholecalciferol

- **Revise requirement for gloves to chemical-resistant gloves, generally with a thickness \geq 14 mils (thicker than the current standard).**
- **Advise (recommend) for post-application follow-up:**
 - 1) search, collect, and dispose of carcasses ,*
 - 2) dispose spilled/ kicked out bait, and*
 - 3) report dead/dying non-target animals for RUPs packaged in \geq 4 lbs. of bait used in structural use and packaged sizes \leq 1lb. bait labeled for consumer/residential use.*
- **Cancel reusable consumer bait stations (1lb or less) and refills.**
- **Limit GUPs to ONLY:**
 - 1) ready-to-use prefilled disposable bait stations, and**
 - 2) bromethalin gummy worms for mole control.**

Zinc Phosphide

- **All products become RUPs.**
- **Cancel all GUPs for control of field pests.**
- **Prohibit spot and broadcast applications to turf, lawns, parks, golf courses, campsites, and other recreation areas.**
- **Require APF10 (half-face elastomeric respirators), along with any fit testing, training, and medical evaluations for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.**

Zinc Phosphide

- Require chemical-resistant gloves for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets.
- Revise requirement for gloves to chemical-resistant gloves, generally with a thickness ≥ 14 mils (thicker than the current standard).
- Require post-application follow-up:
 - 1) *search, collect, and dispose of carcasses,*
 - 2) *dispose spilled/kicked out bait, and*
 - 3) *report dead/dying non-target animals*

Comments on Proposed RUP Classification ?

- Will limit use to only certified applicators under new IN rule (355 IAC 4)
 - Rodenticides were not part of new rule calculation
 - Structural pest managers rely heavily on noncertified technicians
- Will require exhaustive supervision in states using 40 CFR 171 model
 - Daily site-specific instructions (each application site) impractical
 - Daily equipment inspections (each baiting station) impractical
 - Annual training of technicians is ag-centric, not rodenticide-centric
 - Record keeping to document all proceeding costly
- Will require full certification (Cat. 7a) of school, landlord, bldg. mgmt. staff
 - Passing Core + Cat. 7a exams will be extremely high bar for these individuals
 - Cat. 7a is significantly broader than rodenticide use
- Assumes certification adequately addresses rodenticide expertise
 - Rodent control is a small part of Cat. 7a and virtually none of Core (private applicators)
- No access to GUP rodenticides could result in more hazardous misuse of other products (Golden Malrin)

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Comments or Questions ?