SECOND GENERATION ANTIČOAGULANT RODENTICIDES

PREC
July 18, 2014
SECOND GENERATION ANTICOAGULANT RODENTICIDES (SGARS)

- Four active ingredients:
  - Brodifacoum
  - Bromadiolone
  - Difenacoum
  - Difethialone

- Label:
  - House mouse, Norway rat, and roof rat control only
  - In and within 100 feet of structures only (no field uses)

- “Single dose” designed to be lethal in a single feeding
  - Unlike first gens which require “multiple doses” to produce a lethal effect

- Non-target wildlife concerns specifically for SGARs
  - More toxic than first gens
  - Delayed action of anticoagulant allows multiple feedings on SGARs & leads to “super” lethal concentrations in rodents
  - Results in impacts to non-target predators consuming poisoned rodents
DPR REEVALUATION OF BRODIFACOUM

- 1999 DFW request
- Concerns about wildlife being exposed and adversely affected by high levels of brodifacoum residues in target rodents
- DPR placed brodifacoum into reevaluation
  - Data review to determine any significant adverse effects
- U.S. EPA rodenticide assessment indicating similar concerns
May 2008 U.S. EPA RMD for Ten Rodenticides
- Addressed use in and within 50 feet of buildings only
- Later changed to 100 feet of man-made structures

Two major components:
- Reducing children’s exposure to rodenticides used in the home
  - FGARs & non-anticoagulants marketed to residential consumers
    (≤1 lbs. bait) sold in solid formulations (no loose pellets) with bait stations
    - 4 tiers of bait stations

- Reducing wildlife/ecological risks:
  - No residential consumer size SGAR products (≤1 lbs. bait)
  - Bait stations for all outdoor, aboveground uses
    - Tamper resistant if within reach of children, pets, domestic animals, and non-target wildlife
Two types of SGAR products allowed:

- **8 lbs.+**
  - In and within 100 feet of AG buildings and man-made AG structures, some burrow baiting
    - Intended user: ag other than field use, livestock producers

- **16 lbs.+**
  - In and within 100 feet of man-made structures such as homes, food processing facilities, industrial, commercial buildings, etc., some burrow baiting and sewer use
    - Intended user: PCOs, public health officials, etc.

- Prohibited from sale in stores oriented towards residential consumers
Initially, 3 companies refused to comply with the RMD

Argued that U.S. EPA had violated FIFRA by using misbranding instead of official cancellation process

Draft Notice of Intent to Cancel November 2011

Scientific Advisory Panel met December 2011

In January 2013, U.S. EPA announced it would move forward with cancellation
July 2011, request from DFW to designate all SGARs as CA restricted materials

DPR analyzed wildlife incident & mortality data, land use data, and sales & use data

Data indicated exposure & toxicity to non-target wildlife from SGARs a statewide problem

- Of 492 animals analyzed, 73% had residues of at least one SGAR

Draft assessment external peer review & finalized in June 2013
- Designate all SGARs as California restricted materials
  - Only certified applicators can purchase and use these products
  - Permit (except for structural pest control licensees)
  - Only licensed dealers can sell

- Limit the aboveground use of baits within 50 feet of a man-made structure unless there is a “feature” associated with the site that is harboring or attracting the target pest between the 50-foot limit and the limit specified on the label

- Revise definition of private applicator to refer to the federal definition of agricultural commodity.
  - Current AG commodity definition excludes livestock, poultry, and fish
  - These sectors would have option for private applicator certificate
FINAL REGULATIONS
EFFECTIVE JULY 1, 2014

- Comment period closed October 4, 2013
- Received ~26,000 comments
- Regulations approved March 18, 2014
- Reckitt Benckiser filed lawsuit & preliminary injunction to prevent regulations from taking effect July 1, 2014
  - Court sided with DPR--July 1 effective date unchanged
- In May 2014, Reckitt dropped lawsuit
- Regulations became effective on July 1, 2014
In May 2014, Reckitt Benckiser reached an agreement with U.S. EPA to cancel all noncompliant rodenticide products:
- 12 federally registered products
- 4 of 12 registered with DPR

Reckitt agreed to:
- Stop production by end of 2014
- Stop distribution to retailers by March 31, 2015

As of July 1, these products are California restricted materials and can only be sold by licensed pest control dealers.
NEXT STEPS

- DPR intends to close out the reevaluation
- DPR still reviewing data submitted by DFW and wildlife organizations
- DPR webpage on rodent management
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