

SECOND GENERATION ANTICOAGULANT 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

U.S. EPA RISK MITIGATION DECISION

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

U.S. EPA RISK MITIGATION DECISION DISTRIBUTION & PACKAGE SIZE LIMITS

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**

U.S. EPA CANCELLATION ORDER

- 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

CA WILDLIFE IMPACTS & DPR'S ASSESSMENT

- 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

DPR PROPOSED REGULATIONS

JULY 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

U.S. EPA & RECKITT BENCKISER AGREEMENT

- 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

CONTACT INFO

Ann Hanger
Environmental Scientist
Pesticide Registration Branch

916-324-3535
Ann.Hanger@cdpr.ca.gov

