



To: Liphatech Agricultural and Professional Rodenticide Applicators
From: Ted Bruesch - Technical Support Manager
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Topic: EPA's Rodenticide Risk Mitigation Decision

We have been getting many questions about what the EPA's Rodenticide Risk Mitigation Decision (RRMD) means to both pest control operators and agricultural users. Many also want to know about the timeline for implementation. The following is subject to change at the discretion of the EPA, but this is how it stands as of today - at least as Liphatech understands it.

Rodenticide Risk Mitigation Decision - Summary:

- The decision applies to all 10 rodenticide active ingredients and categorizes them as:
 - Acute toxicants (zinc phosphide, bromethalin, cholecalciferol)
 - First-generation (multiple-feed) anticoagulants (warfarin, diphacinone, chlorophacinone)
 - Second-generation (single-feed) anticoagulants (bromadiolone, brodifacoum, difenacoum, difethialone)

Class	Active Ingredient	Liphatech Brand Name
Acute Toxicant	Bromethalin	Gunslinger
First-Generation Anticoagulant	Chlorophacinone	Rozol
Second-Generation Anticoagulant	Bromadiolone	Boot Hill Maki
Second-Generation Anticoagulant	Difethialone	BlueMax FastDraw FirstStrike Generation Hombre

- The decision applies to products which have one or all of the “commensal rodents” (Norway rat, roof rat or house mouse) listed on the label. If none of these three are included in the label, then the decision does not apply.
- Bait stations will be required for all outdoor “above ground” applications of rodenticides. Tamper-resistant bait stations are required where children and non-

target animals can access them. Burrow baiting is not an above ground application as long as all the bait is placed below ground into the burrow.

- The decision creates three classes of rodenticide users:
 - Professional applicators (e.g. “for-hire” and “in-house” PCOs)
 - Agricultural applicators (e.g. commercial growers of food and feed)
 - Consumers (e.g. homeowners, renters, janitors)
- It also creates three chains of distribution:
 - Professional (e.g. national, regional or local pest control product distributors)
 - Agricultural (e.g. farm supply stores and animal health suppliers)
 - Consumer (e.g. hardware, department and grocery stores)
- Agricultural and professional applicators will continue to have access to all forms of rodenticides: soft bait, blocks, bars, pellets, meal, liquid and tracking powder.
 - Liquid concentrates will be prohibited in residences and outdoors.
- Manufacturers and distributors are forbidden to sell second-generation anticoagulants in the consumer distribution chain.
- To further restrict access to second-generation anticoagulants by consumers, those products must be sold in large packages:
 - First generation and acute products = four pounds (minimum) for professional and agricultural users
 - Second-generation products = eight pounds (minimum) for agricultural users
 - Second-generation products = 16 pounds (minimum) for professional users
 - Second-generation products sold in the agricultural distribution chain (e.g. farm supply stores) in packages larger than eight pounds but smaller than 16 pounds, will have label language restricting their use to in and around agricultural buildings and NOT in or around residences
- Consumer product restrictions:
 - Only acute toxicants and first-generation anticoagulants (no second-generation anticoagulants)
 - Only block and soft bait formulations (no pellets, liquid, meal, powder)
 - Packages must be less than one pound
 - Product packages must include at least one tamper-resistant bait station
 - There are several classifications of bait stations depending on uses

Timeline:

- In June 2008, the EPA published new label language guidelines for rodenticide products.
- In December 2009, rodenticide manufacturers submitted proposed labels for all products they intended to register using the new language guidelines (some marginal products will be discontinued).
- By December 2010, the EPA intends to either approve those labels and thereby “register” the products or return them to the manufacturers for further modifications.
- By June 4, 2011, manufacturers will be required to begin using the new labels on products shipped into distribution. Products already in the chain of commerce by June 4, 2011, will be allowed for use according to the directions on the package until they are gone.

Label Language Issues:

It is important to note, EPA contracts with the various states’ lead agencies to interpret and enforce label language. Liphatech is not authorized to officially “interpret” our products’ label language. Furthermore, manufacturers have very little input in the language on rodenticide labels. Most of it is written by the EPA.

There are three label language issues which affect both agricultural and professional rodenticide applicators:

- The EPA has finally allowed us to eliminate the distinction between “Urban and Non-Urban” uses.
- Instead of the “Urban / Non-Urban” language, new labels for all “General Use” (not RUP) rodenticides will include wording restricting the use to inside or within 50 feet of a building. As we understand it EPA does not consider a fence line to be a building. There are numerous rodent infestations which will be complicated by this language. Here are a just a few examples in which rodent infestations may be more than 50 feet away from a building:
 - Norway rat burrows under dumpster pads, and in embankments, dikes or retaining walls
 - Roof rat infestations in fruit and ornamental trees or those affecting outdoor food and feed storage
 - House mouse infestations in telecommunication junction boxes and under cattle feed bunks
- The third label language issue was not part of the original RRMD but the agency has begun requiring anyway. On products labeled for Norway rat, roof rat and house mouse, manufacturers are now required to add the single word “only.” This negates the 2ee exemption written into FIFRA by the U.S. Congress (use against a pest not on the label as long as the application site and technique are on the label).

Economic Impacts:

There are multiple ways in which the RRMD will negatively affect the financial situation of both agricultural and professional applicators. Here are a few to consider:

- Currently the largest users of second-generation anticoagulant, rodenticide-pellet formulations are consumers. They are keeping the cost low for agricultural and professional applicators due to economies of scale.
- Infestations outside the 50-foot zone must be treated using traps or other old rodent-control technology. Rodent-control professionals must pass these costs onto their customers to retain their profitability and viability as a business.
- Currently there are very few, if any, rodenticides registered for use against unlabeled disease-carrying rodent pests such as deer mice, cotton rats and white footed mice. Resulting alternative treatment costs must also be recovered from customers. Also, make sure all contracts, advertising and verbal representations do not offer to use rodenticides to control these pests.

If you have further questions, please contact me. I will do my best to get an answer for you.

Ted Bruesch
bruescht@liphatech.com