



Rodenticide Committee
2015 ASPCRO Annual Board Meeting Report
August 22, 2015

Committee Members: Bob Rosenberg, National Pest Management Association; Jack Peterson, Arizona Department of Agriculture; John Dalley, North Carolina Department of Agriculture & Consumer Services; John Scott, Colorado Department of Agriculture; Jonathan Berger, BASF; Kathy Fedder, Comcast, Ted Bruesch, Liphatech; Linda Johns, Montana Department of Agriculture (Chair).

The ASPCRO Rodenticide Committee submits the following report for the 2015 Annual Board meeting:

The committee met during the 2015 Mid-Year Board meeting in Detroit, Michigan to discuss the label language change for commensal rodenticides that were approved by EPA stating “for use only” on House mice, Norway rats and Roof rats. ASPCRO asked EPA if they would consider removing the verbiage “only” but were informed that this was not an option. ASPCRO then sent a letter to EPA asking for a total of twelve rodent species to be listed on the label. EPA responded back that the additional species would be fine, but shortly after, ASPCRO received a response from EPA with concerns about endangered species within certain genera that would be listed on the label.

It was requested to ask Meredith Laws, EPA about the lab data process for certain species. What to do if there isn’t lab data available, how should the data be produced and what data will be expected? There is, however, a problem with a lack of species specific Laboratory data and what EPA will accept. If the lab data has to meet a certain criteria, how do registrants meet this need if certain species cannot be trapped and placed into a lab environment? Is there a supply of rodents available for lab data work?

ACTION ITEMS: 1) The committee will update risk mitigation compliance sheet after receiving response from EPA on label language change 2) The committee will send a new letter to EPA addressing the endangered species issue.

On May 27, 2015 Ted Bruesch sent an email to ASPCRO stating “The EPA has indicated they will not allow the addition of the text “*Neotoma spp.*” to any rodenticide labels. (See correspondence below) This raises a question. Do they mean:

a) They will not allow the use of rodenticides against any species in the *Neotoma* genus?

Or

b) They want manufacturers to list individual species of rodents in the genus, as is the case with all of the other rodents, including for example, those in the *sigmodon* and *peromyscus* genera? In this case manufacturers would be allowed to individually list the three (3) primary packrat/wood rat pest species: *Neotoma albigula* (White-throated), *Neotoma mexicana* (Mexican) and *Neotoma micropus* (Plains).

One of the original reasons for either removing the word “only” from the listing “house mouse, roof rat and Norway rat” or adding a list of other pest rodents, was to provide the regulated pest control industry with properly labeled rodenticides to protect property and health from damage by pest rodents, other than the three currently allowed. Furthermore, it would reduce the need for 24c SLN registrations, such as the one for packrats in Arizona.

Text message received from Gene Benbow, EPA:

The *Peromyscus* species will require efficacy data to support, as they are among the most significant disease vectors of all rodents in the country. The Cotton rat was revised from including the entire genus to only the actual Cotton rat (*Sigmodon hispidus*), and the *Neotoma* were removed entirely as the genus includes more than one T/E species that we cannot label as targets for obvious reasons.

The committee met via conference call on May, 29, 2015 to discuss the concerns about producing lab data that EPA has requested for the three *Peromyscus* species (Cotton mouse, Deer Mouse and Whited footed mouse). Tom Schmidt commented that lab testing can’t go beyond specific laws when trying to get data on “wild animals” in a lab environment and that you must go through USDA to receive a license to conduct this type of testing on “wild caught animals”. Ted also mentioned that there is a lab in North Carolina that sells *Peromyscus* species that can be used for lab testing.

On June 16, 2015 ASPCRO received an email from Gene Benbow, EPA stating “I work in Meredith’s branch and saw your revised list of “2ee pests” on the June 5, 2015 letter. I wanted to shoot you a quick email to let you know how we chose to handle the labels coming in recently for amendment to add those species. Since the original letter resulted in a large number of labels coming in for amendment, we had to determine which products would be eligible and which would have to be withdrawn, which species we would have to require efficacy data to support, and also which species (if named) would result in someone applying rodenticide to target a T/E animal. What we did was essentially:

1. Require efficacy data for *Peromyscus*
2. Delete *Neotoma* species
3. Revise “Cotton rats” to the most common species likely to be baited in a commensal setting, *Sigmodon hispidus*.”

On June 23, 2015, John Scott and I followed up with EPA addressing the above issue and received an email from Meredith Laws, EPA later that afternoon stating “Following up on our conversation with you and Linda this afternoon, I am writing to let you know we will accept the three *Neotoma* species (White-throated woodrat, Mexican woodrat, Plains woodrat) on rodenticide labels as you have proposed in your June 5, 2015 letter (see attachment). This decision applies to new registrations and to amendments of existing registered products.

Rodenticide Risk Mitigation Decision Compliance Fact Sheet:

The Rodenticide Risk Mitigation Decision Compliance Fact Sheet (see attachment) has been updated to accommodate the new rodenticide label change. It will be ready for review at the ASPCRO Annual meeting in August, 2015.

Respectfully submitted,

A handwritten signature in cursive script that reads "Linda Johns".

Linda Johns, Chair