



Rodenticide Committee
2015 ASPCRO Midyear Board Meeting Report
April 20, 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 Midyear Board meeting:

The committee met via conference call since the 2014 Mid-Year Board meeting to discuss the lack of non-commensal label language on rodenticides currently labeled for use only to control Norway rats, roof rats and house mice in and within 100 feet of man-made structures.

Rodenticide Labeling Restrictions for Commensal Rodent use Only:

The final letter was sent to Meredith Laws, Pesticide Re-Evaluation Division, EPA on January 7, 2015 addressing the current rodenticide labeling restrictions for commensal rodent use only (see attachment). The letter asked EPA to consider the following recommendation: Replace the statement “This product may only be used to control Norway rats, roof rats, and house mice...” with “This product may only be used to control the following rodent pests in an around man-made structures:

House mouse (*Mus musculus*)
Norway rat (*Rattus norvegicus*)
Roof rat (*Rattus rattus*)
Cotton mouse (*Peromyscus gossypinus*)
Cotton rats (*Sigmodon* spp.)
Deer Mouse (*Peromyscus maniculatus*)
Eastern harvest mouse (*Reithrodontomys humuli*)
Golden mouse (*Ochrotomys nuttalli*)
Pack rats (*Neotoma* spp.)

Polynesian rat (*Rattus exulans*)
Meadow vole (*Microtus pennsylvanicus*)
White footed mouse (*Peromyscus leucopus*)

The response letter from Meredith Laws, EPA on January 21, 2015 addressed the target pests on rodenticide labeling (see attachment). The letter states “After reviewing the points made in your September letter as well as during the January 6, 2015 conference call with yourself and other ASPCRO leaders (Liza Fleeson, Linda Johns and Derrick Lastinger), we agree with your proposal to allow certain rodent species, specified by ASPCRO, to be added to products that are used in and around homes and other man-made structures. Since you have reported that the products have been used successfully against these pests in the past prior to the 2ee restriction, EPA is relying on your judgement and experience to support our approval of this labeling. Registrants may submit applications to amend their labels to remove the 2ee restriction imposed by EPA and include the following text proposed by ASPCRO:

“This product may only be used to control the following rodent pests in and around man-made structures:

House mouse (*Mus musculus*)
Norway rat (*Rattus norvegicus*)
Roof rat (*Rattus rattus*)
Cotton mouse (*Peromyscus gossypinus*)
Cotton rats (*Sigmodon* spp.)
Deer Mouse (*Peromyscus maniculatus*)
Eastern harvest mouse (*Reithrodontomys humuli*)
Golden mouse (*Ochrotomys nuttalli*)
Pack rats (*Neotoma* spp.)
Polynesian rat (*Rattus exulans*)
Meadow vole (*Microtus pennsylvanicus*)
White footed mouse (*Peromyscus leucopus*)”

It is important to note that EPA will evaluate the amendments individually, and at our discretion supporting laboratory data may be required. Additionally, this revision cannot be applied to field-use rodenticide products.

Ongoing concerns for rodenticide label change:

Meredith Laws, EPA sent an email on April 7, 2015 stating “For the wording we agreed to on the rodenticides, is there a reason that ASPCRO didn’t provide a species name for Cotton rats or Pack rats? My folks are asking because the wording is shown as *Sigmodon* spp. and *Neotoma* spp. There is an Endangered cotton mouse species and also an Endangered pack (wood) rat species. Can ASPCRO provide the species that is intended to be targeted? We would like it specified rather than leaving it to any species in the genus.”

The Rodenticide committee is compiling information at this time to address this concern and will respond back to EPA once a decision has been made.

Rodenticide Risk Mitigation Decision Compliance Fact Sheet:

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

New Rat Poison Deadly to Pets Article:

I sent an email to the Rodenticide committee asking for comments and/or concerns on an article from Northern Ag News on November 14, 2014 addressed concerns when using products containing the active ingredient Bromethalin. The article stated “The Lockwood Veterinary Clinic in Billings put out a warning this week on their Facebook page after seeing a number of dogs brought into the clinic who had ingested rat poison with bromethalin. According to Dr. Jody Anderson, “The new poisons are very potent and keeping them out of reach of your pet is not good enough. The poisoned mice get into and carry the poison around and both taste really good. It is awful to watch your best friend struggle to stand, unable to control movement, seizure, and more often than not die.” And “The EPA offers a list of approved rodenticides that meet regulatory standards and can be used by homeowners. Be sure to select a product that contains an active ingredient other than bromethalin. Both diaphacinone and chlorophacinone are short-acting anticoagulants. Should your pet ingest one of these substances, most veterinarians will be familiar with standard methods of diagnosis and treatment. No rodenticide is entirely safe, but if you must use one, it makes sense to select a product that if ingested can be easily diagnosed and in most cases, effectively treated.”

The full article can be found at

<http://www.northernag.net/AGNews/AgNewsStories/TabId/657/ArtMID/2927/ArticleID/3598/New-Rat-Poison-Deadly-to-Pets.aspx>

John Scott responded back with “I haven't heard of any cases in Colorado yet, but I've read quite a bit of information on it due to concerns raised by the general public and it is not very forgiving if a pet gets into it.”

Respectfully submitted,



Linda Johns, Chair