



January 7, 2015

Meredith Laws, Chief  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 7508P  
Washington, DC 20460

RE: Current Rodenticide Labeling Restrictions for Commensal Rodent Use Only

Dear Ms. Laws:

Following our discussion, the Association of Structural Pest Control Regulatory Officials (ASPCRO) requests the Environmental Protection Agency replace the statement “This product may only be used to control Norway rats, roof rats, and house mice...” on current rodenticide labels with “This product may only be used to control the following rodent pests in and around man-made structures:

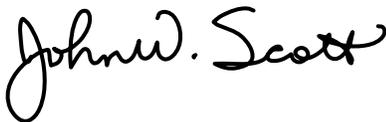
House mouse (*Mus musculus*)  
Norway rat (*Rattus norvegicus*)  
Roof rat (*Rattus rattus*)  
Cotton mouse (*Peromyscus gossypinus*)  
Cotton rats (*Sigmodon* spp.)  
Deer Mouse (*Peromyscus maniculatus*)  
Eastern harvest mouse (*Reithrodontomys humuli*)  
Golden mouse (*Ochrotomys nuttalli*)  
Pack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

Amendment of the rodenticide labeling will allow use on non-commensal rodents that pose a threat to structures and public health. The regulated community is left with few options for controlling populations of *Peromyscus* spp. (e.g. white footed mouse (*Peromyscus leucopus*) and the deer mouse (*Peromyscus maniculatus*) as well as other pest rodents (e.g. pack rats (*Neotoma* spp.), cotton rats (*Sigmodon* spp.), and Polynesian rats (*Rattus exulans*)) in and around man-made structures. The label amendment will provide the regulated community with the appropriate label guidance to control pest rodents other than house mice, roof rats and Norway rats in and around manmade structures while addressing EPA's original intent of the RMD to avoid exposure to non-target species

Prior to the 2008 RMD, end users were effectively using these products to control non-commensal rodents under the 2 (ee) allowance with positive efficacious results that displayed no adverse effects. ASPCRO supports the use of manufacturer laboratory data to show product efficacy on non-commensal rodent species.

We appreciate EPA's willingness to collaborate with ASPCRO to find a workable solution that contributes to the resources available to control commensal and non-commensal rodent species in and around manmade structures. If you have any questions please do not hesitate to contact me directly at 303-869-9056 or by e-mail at [JohnW.Scott@state.co.us](mailto:JohnW.Scott@state.co.us) .

Sincerely,

A handwritten signature in black ink that reads "John W. Scott". The signature is written in a cursive style with a large, looped initial "J".

John Scott  
President  
Association of Structural Pest Control Regulatory Officials