

Rodenticide Committee Report

August 22, 2023

The ASPCRO Rodenticide Committee met in person at the Whitney Peak Hotel in Reno, NV on August 22, 2023.

There were 29 people in attendance and a robust discussion of the projected effects of EPA's Rodenticide PIDs. We focused our conversation on these PIDs.

With respect to the proposed cancellation of broadcast applications to rangeland, pastures, and lawns; and the proposed cancellation of uses in forests, vineyards, and other crop settings, when the group was asked if any of these proposed changes would affect them, there were no responses.

With respect to the proposed designation of rodenticides as Restricted Use, the group responded as follows:

- State agencies described the need to consider and absorb the need to accommodate many more licensees. Creating or allowing for additional opportunities for training and workshops for CECs going forward. Additional training for inspection and investigation staff, potential new RUP Dealer licenses, potential to add new information, and test questions for the licensure categories.
- The applicator industry described the concern of training and licensure for their applicants, the costs of the products and services being transferred down to the customer, and the potential to lose some contracts. Specifically:
 - Many contracts with food production facilities are prohibitive of RUPs on those facilities. If all rodenticides are designated as RUPs, these facilities will no longer be able to be serviced as needed to ensure the integrity of our food systems.
 - The pesticide applicator industry may not be able to access/purchase RUPs in the same areas where they are currently working as there is no guarantee that the vendors will be willing to gain licensure as an RUP Dealer. Without access to the tools, the applicator business may not be able to perform work in all areas.
 - In some states, Public Health may not allow the use of RUPs in child daycare facilities. Those contracts may be in jeopardy and therefore the protection of children may be in jeopardy.
 - There was a general statement that should be received as a request to consider the original intent of demonstrating experience when licensing and if the change from GUP to RUP should confer the additional experience requirements to gain licensure.
- The product manufacturers in attendance discussed the potential effects of RUP designation in changes in distribution channels, the need for dealer licenses throughout the supply chain, the label change process for RUPs that can be difficult, and the potential of creating/causing more unlawful uses.

As costs and difficulty to access the tools needed to protect the public health and our food systems increase, and with the stated goal of EPA to be mindful of environmental justice, the Rodenticide Committee is concerned that EPA's Rodenticide PIDs are in conflict with EPA's environmental justice goals. Meaningful access to protection from rodents may longer be affordable to underserved communities if EPA moves forward with its Rodenticide PIDs.

There were some concerns with respect to the carcass search obligations, primarily, will a pest control operator now be liable for the presence of any animal carcass whether or not that animal would have consumed a rodenticide bait or the target of such a bait. There was some concern for the maintenance of the EPA Bulletins as part of record keeping and the EPA's vision of how this looks. Will there be a requirement to add a bulletin for each and every application, or will the maintenance of a record of the bulletin on a monthly basis suffice?

Similarly, there was a short discussion on the proposed PPE obligations including the need to wear a respirator outdoors. The Rodenticide Committee would really appreciate an opportunity to see both the science and the evidence of an issue behind this proposal. Applicators are already hard to find and keep, and if they are faced with working under conditions of wearing a respirator in the heat, it may be harder to keep them employed.

Finally, the Rodenticide Committee asked the group "What do want from ASPCRO and the Rodenticide Committee on these issues?" The response was more info from the EPA on the reasoning behind the PIDs and for the EPA to communicate more directly with its regulatory partners. States would appreciate learning about EPA's intent and actions from EPA, not from pesticide manufacturers.

Respectfully Submitted,

Matt Lopez