



Rodenticides Status Update

ASPCRO Annual Meeting
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Overview

- Registration Review Status
- Biological Evaluation Status
- Schedules and Path Forward
- External Engagement
- FAQs and Additional Information

Rodenticides Registration Review



- Public comment period for the 2022 Proposed Interim Decisions closed on February 13, 2023
- Approximately 22,000 comments were posted to the 11 rodenticide dockets (includes mass mail campaigns)

Overview of Comments on the PID

- Concerns over non-target wildlife exposure, incidents, and protection of listed species
- Misuse
- Benefits of rodent control
- Questions on feasibility, enforceability, and effectiveness of proposed mitigation (e.g., carcass search)
- Concerns related to proposing Restricted Use Pesticide (RUP) designation
- Personnel Protective Equipment (PPE)
- Suggestion of refining mitigation further by rodenticide type
- Other costs and impacts of mitigation

Biological Evaluation and “Rodenticide Strategy”

- EPA committed to issuing final biological evaluations for all rodenticides by November 2024 and to initiate consultation, where needed
- Goal of the Rodenticide Strategy is to identify early mitigation measures for all listed species and all 11 rodenticides for which EPA predicts the likelihood of a future jeopardy or adverse modification finding by the Services
- Doing so will inform any ESA consultation with the Services as they make these formal findings and should expedite those findings



Overview of Comments on Draft BE

- Received over ~2,000 comment submissions
 - Draft BE, Pesticide Use Limitation Areas (PULAs) and Bulletins, “No Effect” call for aquatic taxa
 - Rodenticide Strategy mitigation comments including ESA specific mitigation approach, FIFRA/PID mitigation approach
 - Extension requests
 - EPA granted extension for 15 days (from January 29, 2024, to February 13, 2024)

Alignment of Rodenticide BE and Registration Review Schedules

- Summer 2024
 - Internal team meetings to discuss impact of comments on the BE, Rodenticide Strategy, and PID mitigation
- Fall 2024
 - Team finalize changes to the BE and anticipated PID mitigation updates
- November 2024 – Final BE
 - Technical comments on the BE, comments on BE conclusions, and mitigation specific to threatened and endangered (listed) species will be addressed in the BE
- Spring 2025 – Amended PID
 - FIFRA mitigation comments and benefits of rodenticides will be addressed with the PID
 - There will be a 60-day public comment period on the amended PID

External Engagement

- Meetings with USFWS to discuss analytical approaches and BE tentative conclusions
- Participation in the CO/WY rodenticide tour and NPMA local DC tour
- Meetings with the Rodenticide Task Force on the PID and BE, voluntary studies, and the registration review path forward
- Presentation for Tribal Pesticide Program Council on the draft BEs and rodenticide strategy

What to Expect Post-BE and Amended PID

- EPA anticipates initiating formal consultation with the Services following the completion of the final rodenticide BE in November
- EPA will review public comments submitted on the amended PID and respond in the interim decision (ID)
- Label amendments are due 60-days after the ID is published
- Should stewardship continue to be required as a change to the terms and conditions of registration (as currently proposed), EPA will review registrant plans to ensure they align with the ID mitigation

Frequently Asked Questions

- Why did EPA propose to remove field treatment uses for chlorophacinone and diphacinone?
 - EPA needs data that demonstrates no uptake for chlorophacinone and diphacinone to be considered non-food use
- Given the status of registration review and the BEs, how would new ecological exposure and monitoring data for rodenticides be considered?
 - The Services may consider new information at the time of the BiOp

Additional Information

EPA rodenticide web page: <https://www.epa.gov/rodenticides>

Rodenticide dockets: www.regulations.gov

Brodifacoum: EPA-HQ-OPP-2015-0767	Difethialone: EPA-HQ-OPP-2015-0770
Bromethalin: EPA-HQ-OPP-2016-0077	Diphacinone: EPA-HQ-OPP-2015-0777
Bromadiolone: EPA-HQ-OPP-2015-0768	Strychnine: EPA-HQ-OPP-2015-0754
Chlorophacinone: EPA-HQ-OPP-2015-0778	Warfarin: EPA-HQ-OPP-2015-0481
Cholecalciferol: EPA-HQ-OPP-2016-0139	Zinc Phosphide: EPA-HQ-OPP-2016-0140
Difenacoum: EPA-HQ-OPP-2015-0769	