

# Rodenticide

## TASK FORCE

On November 29, 2022, the EPA released its Proposed Interim Decisions (PIDs) for the rodenticides with label changes that, if implemented, will have a major impact on all Pest Management Professionals (PMPs) who apply rodenticides. The industry and the public will have until February 13, 2023, to submit written comments.

The EPA proposals that would affect PMPs are the following:

- All rodenticides would be classified as Restricted Use Pesticides (RUPs), which would restrict their sale and use to state-licensed certified pesticide applicators. States do not have uniform regulations for RUPs, but in general, requirements include passing an exam to obtain the license, taking regular additional training for continuing education units (CEUs), and keeping records of applications when doing something as simple as refilling bait stations at a commercial or residential property.
- The PPE label requirement for gloves would be changed to chemical resistant gloves, generally with a thickness  $\geq$  14 mils (thicker than the current standard) which are unnecessary, more costly, and cumbersome when placing baits.
- Loose bait applications (pellets, treated grains, and meals) will require applicators to use elastomeric half mask respirators (APF10). The use of respirators during the physically demanding process of applying rodenticides poses hazards to the wearer, including heat exhaustion and breathing difficulties. The mask fitting, training and medical evaluation requirements for employees would increase the costs to pest control companies.
- The cancellation of surface (non-bait station) applications of the first generation anticoagulants and zinc phosphide for ground squirrels and voles on turf, lawns, recreation areas and other sites accessible to children and pets will make treatment unfeasible in some circumstances, and increase costs and decrease treatment efficacy for most sites. Municipalities, facility managers, and PMPs who provide services to these customers are among those who will be impacted. These applications protect public parks, sports playing fields, golf courses, and other areas where rodents cause physical damage and harbor parasites and diseases.

The Rodenticide Task Force's website [Home | Rodenticide Task Force \(responsiblerodenticides.org\)](https://responsiblerodenticides.org) has the EPA's documents organized and available for downloading, as well as summaries of the mitigation measures. There are detailed instructions on how to submit comments, links to the EPA's comment submission portal on Regulations.gov, and templates for comment letters that people can customize to provide comments on the mitigation measures that will affect them. These comments will assist the Task Force and other industry organizations in having a constructive dialogue with the EPA about how the proposed changes decrease efficacy and increase costs. We encourage all PMPs to make their voice heard through this coordinated industry campaign.

