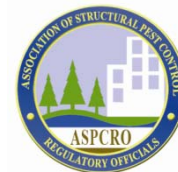


## Rodenticide Risk Mitigation Decision Compliance



- This document applies only to rodenticide baits labeled for use against house mice, Norway rats and roof rats (commensal rodents) containing any of the ten currently registered active ingredients (AI):
  - **First Generation Anticoagulants:** *Warfarin, Chlorophacinone, and Diphacinone*
  - **Second Generation Anticoagulants:** *Brodifacoum, Bromadiolone, Difenacoum, and Difethialone*
  - **Non-Anticoagulants:** *Bromethalin, Cholecalciferol, and Zinc Phosphide*
- **Does not** apply to rodenticides labeled only for rodents other than commensal rodents such as voles, ground squirrels and pocket gophers.
- **Does not** apply to commensal rodent tracking powders as these products were re-registered separately (with new label language) in 2009.

### Products in the Marketplace:



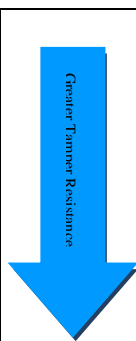
- Manufacturers were required to have products comply with the RMD by June 4, 2011. Non-compliant products could not be shipped after that date.
- Twelve of Reckitt-Benckiser's D-Con products do not comply with EPA's RMD. Due to a federal court decision, Reckitt may continue to sell these products until EPA completes the formal cancellation process, initiated in January 2013. Although D-Con products may continue to be sold, as of April 2013, at least one state has initiated regulatory action to remove these products from consumer markets. Check with your state lead agency for pesticides to determine current status in your state.
- Distributors are still allowed to sell rodenticides obtained prior to June 4, 2011, including non-compliant products.
- Users can use rodenticides obtained prior to June 4, 2011, following the attached container label, until depleted.

	<b>Type of Rodenticide Product:</b>		
	<b>Consumer Products</b>	<b>Pest Control Products</b>	<b>Agricultural Products</b>
<b>Active Ingredients Availability:</b>			
Non-anticoagulants	Available	Available	Available
1 <sup>st</sup> Generation Anticoagulants	Available	Available	Available
2 <sup>nd</sup> Generation Anticoagulants	Not Available	Available	Available
<b>Package Requirements:</b>			
Non-anticoagulants	1 pound max. - must include at least one bait station – above ground use only	4 pound min.- above ground and in burrow uses	4 pound min. – above ground and in burrow uses
1 <sup>st</sup> Generation Anticoagulants	1 pound max. - must include at least one bait station – above ground use only	4 pound min. – above ground and in burrow uses	4 pound min. – above ground and in burrow uses
2 <sup>nd</sup> Generation Anticoagulants	Not allowed	16 pound min. – above and in burrow uses	8 pound min.* - above ground and in burrow uses
<b>Formulations Available:</b>			
Block and other Securable Formulations	Yes	Yes	Yes
Pellets, Liquids, Meals, Treated Grain	None allowed	Yes	Yes
<b>Distribution Channels:</b>			
Non-anticoagulants	Products may be sold anywhere	Only available through Pest Control Outlet Distribution. <b>Not</b> allowed to be offered for sale at Hardware, Grocery, Department, Etc.	Only available at Ag Distribution and Farm Supply Stores. <b>Not</b> allowed to be offered for sale at Hardware, Grocery, Department, Etc.
1 <sup>st</sup> Generation Anticoagulants (See package size and bait station requirements)			
2 <sup>nd</sup> Generation Anticoagulants	Not allowed for sale to consumers		

\* These packages will have label language prohibiting use in residential buildings.

### Bait Stations For Residential Consumer Rodenticide Products: Tier I-IV

Tier	Qualifications
<b>4</b>	<ul style="list-style-type: none"> <li>• Resistant to opening by child under 6 years old</li> <li>• Indoor use only</li> <li>• Non-refillable – one time use</li> <li>• Not reasonably anticipated to release other than small quantities of bait</li> </ul>
<b>3</b>	<ul style="list-style-type: none"> <li>• Tamper resistant for children</li> <li>• Indoor use only</li> </ul>
<b>2</b>	<ul style="list-style-type: none"> <li>• Tamper resistant for children and dogs</li> <li>• Indoor use only</li> </ul>
<b>1</b>	<ul style="list-style-type: none"> <li>• Tamper resistant for children and dogs and weather</li> <li>• Indoor and outdoor use</li> </ul>



## Common Products

The currently registered AIs can be found in hundreds of branded products. The following is not intended to be a complete listing. It only provides some examples of some of the most common products in use. (07-20-12) No recommendation is being made.

First Generation Anticoagulants	Common AI %	Predominant Manufacturers	Common Brand Names
Chlorophacinone	0.005	Liphatech J.T. Eaton	Rozol, Ortho Rodenticide Products AC 90
Diphacinone	0.005	Bell Laboratories J.T. Eaton Haaco/Neogen	Ditrac, Erazo Ag, Tomcat Bait Block Ramik (Green, Brown, Mini)
Warfarin	0.025	Haaco/Neogen Scimetrics	Rodex Kaput Rat & Mouse
<b>Second Generation Anticoagulants</b>			
Brodifacoum	0.005 0.0025	Bell Laboratories d-Con Haaco/Neogen Scimetrics Syngenta	Final & Jaguar d.Con Havoc Kaput Doom Talon, Weatherblok
Bromadiolone	0.005	Bell Laboratories Farnam Liphatech PelGar (U.K.) Unichem (Slovenia)	Confrac, Hawk Just One Bite Maki, Boot Hill Brigand Ratimor
Difenacoum	0.005	Haaco/Neogen Victor/Woodstream	DiKill Multi-Kill
Difethialone	0.025	Liphatech	Generation, Hombre, BlueMax, FirstStrike, d-Con
<b>Non-Anticoagulants</b>			
Bromethalin	0.01	Bell Laboratories Haaco/Neogen J.T. Eaton Liphatech PM Resources	Fastrac, Rampage, Tomcat (Bromethalin) CyKill Top Gun Gunslinger Assault
Cholecalciferol	0.075	Bell Laboratories	Agrid, Terad3
Zinc Phosphide	2.0	Bell Laboratories Haaco/Neogen	ZP Pelleted Bait Prozap

### Significant Label Changes Affecting Use – including recent changes:

- All outdoor applications must be made within 50 feet of a “building”. *On 3-20-12 the EPA agreed to change this to within 100 feet of a man-made structure except that fences are not considered structures.*
- All outdoor above ground applications must be in a tamper-resistant bait station. *On 3-20-12 the EPA agreed to revise this for pest control and agricultural uses to also allow:*
  - *burrow baiting with 1<sup>st</sup> generation anti-coagulant and non-anticoagulants within or beyond 100 feet of structures*
  - *burrow baiting with 2<sup>nd</sup> generation anticoagulants within 100 feet of man-made structures*
- The “urban” / “non-urban” language was eliminated, making it legal to place bait stations outdoors on a farm (subject to the distance restrictions listed above).
- The language “can only be used to control house mouse, roof rat and Norway rat” was added to products if the manufacturer had not provided data for other species. This precludes the deliberate application of a rodenticide to control any rodent pest species not listed on the label. Previously applicators could use a product for non-commensal rodents, such as deer mice or pack rats under the 2ee exemption of FIFRA.

### Useful Websites:

- <http://www.epa.gov/pesticides/mice-and-rats/>
- <http://www.epa.gov/pesticides/mice-and-rats/consumer-prod.html#risk>
- <http://www.epa.gov/opp00001/controlling/rodents.htm>

