



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Response to Comments from Stakeholders on Analysis of Rodenticide Bait Use

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Introduction

The Agency received comments from numerous sources on its Analysis of Rodenticide Bait Use posted in EPA's EDOKET on September 02, 2004. Many stakeholders provide useful critique and/or data that could be used in the preparation of a benefits assessment of rodenticide bait use. Some of the comments, while not specifically addressing the Rodenticide Bait Use document, discuss the benefits of rodenticide bait use in rodent control. Numerous letters from pest control operators (PCOs), growers, and other stakeholders encourage the Agency to retain the uses of rodenticide baits, but do not provide data that can be used in the preparation of a benefit assessment. General comments and testimonials that did not contribute specific rodenticide bait use information are addressed as a group (see 1. below).

1. General Comments and Testimonials

Comment: Over one hundred stakeholders (Docket number #OPP-2004-0033, response numbers #0023-0038, #0040-0054, #0056, #0058, #0060-0078, #0080-0090, #0093-0098, #0100-0103, #0107-0116, #0118, #0119-0120, #0122, #0125-0129, #0131-0133, #0138-0140, #0142, #0144-0148, #0152, and #0159) submitted short testimonials highlighting the value of rodenticides for controlling rodents that affect humans, their structures, and crops. These stakeholders urge the Agency to realistically consider the many benefits of rodenticide baits when considering mitigation measures. While the vast majority of these generic comments were filed by pest control professionals, a few were contributed by rodenticide manufacturers, growers, and private

citizens. Most of these comments provided limited information on types of products used and species of rodents controlled.

Response: The Agency does weigh the risks and benefits of pesticides when considering any potential regulatory action that may affect its use. As a first step in this process, the Agency posted its Analysis of Rodenticide Use Baits in EPA's EDOCKET, along with the ecological risk assessment. This bait use analysis document describes in some detail the various ways in which rodents may endanger humans and damage their crops and belongings. The document also discusses how the nine rodenticides currently being reviewed by the Agency are used to manage rodent pests.

2. Use Information and/or Critique Provided to the Agency

Comment: As requested by the Agency, information and comments on a wide range of bait use issues were submitted by numerous stakeholders, including: the Contra Costa Mosquito and Vector Control District (OPP-2004-0033-0079), Schramm, Williams & Associates, Inc. in behalf of the California Pistachio Commission (No. OPP-2004-0033-0100) and the Fresh Carrot Advisory Board of California (No. OPP-2004-0033-0105), The Central Oregon Hay Grower's Association (OPP-2004-0033-0118), the San Francisco Department of the Environment (OPP-2004-0033-0123), the California Department of Food and Agriculture (OPP-2004-0033-0136 and -0137), the Animal Protection Institute (OPP-2004-0033-0141), the California Alfalfa and Forage Association (OPP-2004-0033-0143), Bill Lowe, Organization of Kittitas County Timothy Hay Growers & Suppliers (OPP-2004-0033-0151), the Virginia Polytechnic Institute, Defenders of Wildlife, American Bird Conservancy, TEDX, Inc., Beyond Pesticides/NCAMP, Northwest Coalition for Alternatives to Pesticides, Californians for Alternatives to Toxics, and Rachel Carson Council, Inc. (OPP-2004-0033-0155), the California Farm Bureau Federation (OPP-2004-0033-0156), Global Environmental Options (OPP-2004-0033-0158), Reckitt Benckiser Inc. (OPP-2004-0033-0160).

Response: The Agency appreciates receiving the comments and information provided by these stakeholders. We will take them into consideration when we refine the rodenticide bait use analysis.

3. The Agency's Benefits Assessment is Weak or Lacking

Comment: Several stakeholders, including Syngenta (OPP-2004-0033-0091), Ronald D. Grant D. V. M. on behalf of PM Resources, Inc. (OPP-2004-0033-0101, OPP-2004-0033-0121), and HACCO, Inc. (OPP-2004-0033-0124), remarked that an in-depth benefits assessment for rodenticides was either deficient or lacking altogether. Examples of such comments are: "EPA's benefits analysis does not fully address the many public health, welfare, and economic benefits that rodenticides make possible." and "EPA's summary of the benefits offered by these nine rodenticides is entirely lacking and fails to summarize accurately the enormous public health benefits offered by these rodenticides." Some stakeholders provided suggestions on specific rodenticide benefits that, in their view, an EPA benefit assessment should address.

Response: The Agency has not completed its benefits analysis for rodenticide baits. The

summary of benefits found in the ecological risk assessment document was not intended to be a benefits assessment. However, a related document, Analysis of Rodenticide Bait Use, posted in the electronic docket along with the ecological risk assessment, does discuss at some length the many benefits of rodenticide bait use, thus addressing most of the benefits-related issues and concerns expressed by these stakeholders. As this analysis is refined, the benefits aspect of rodenticide baits will be addressed in greater detail by the Agency. If any quantitative data on benefits was submitted by stakeholders, that information will be taken into consideration in the refined document.

4. Integrated Pest Management (IPM)

Comment: the San Francisco Department of the Environment (Docket No. OPP-2004-0033-0123) felt that the IPM approach to rodent control is not discussed in sufficient detail and that non-chemical approaches are not given the importance that they deserve in the Agency's bait use assessment. According to this stakeholder, over-emphasizing chemical control while downplaying IPM and non-chemical control alternatives is an Agency policy shortcoming. The Rodenticide Registrants Task Force (RRTF) (Docket No. OPP-2004-0033-0157) and Reckitt Benckiser Inc. (OPP-2004-0033-0160) question the accuracy and validity of the IPM-compatibility characterization for rodenticide baits that appears in the use matrix (Table 1) of the bait use analysis.

Response: EPA acknowledges that, under an IPM approach, pesticides represent one of several measures available for managing pests in general, including small mammals. IPM and the numerous nonchemical management techniques available to manage rodents were indeed discussed in the use analysis document. However, since this analysis attempted to characterize the use of the nine rodenticide baits that are at present undergoing review by EPA, rather than rodent management in general, the emphasis of the analysis was on bait use. As this analysis is refined, these comments will be taken into consideration, and the discussion of IPM and nonchemical approaches to rodent control will likely be expanded. As explained in page 32 of the use analysis, the IPM characterization column was included in Table 1 to stimulate public comments and further discussion. At this time, the Agency has not made any determinations regarding IPM compatibility issues for rodenticide baits.