

## **ACCESS TO RODENTICIDES IS UNDER ASSAULT BY U.S. EPA**

The U.S. EPA is in the process of deciding how people will be able to access and use rodenticides. It has recently released for public comment four sweeping Proposed Interim Decisions (PID's) that **will significantly impact your access to and usage of all rodenticides** regardless of active ingredient. As you know, rodenticides are the primary, most effective tool used to provide protection to agricultural operations from the disease and destruction caused by out-of-control rodent populations.

While there is a wide array of implications associated with EPA's unprecedented, proposed changes, the most disturbing aspect is the **RECLASSIFICATION OF ALL BULK RODENTICIDES TO RESTRICTED USE PRODUCTS (RUP)**. If these measures are allowed to go into effect, the repercussions to the agricultural community's ability to defend against rodents will be nothing short of catastrophic.

### **For Farm Store Retailers**

- More than 90% of the rodenticides you currently have on your shelves will be eliminated.
- In order for you to continue to sell them, employees must be licensed to sell RUP products and stores must have the ability to comply with all tracking and reporting requirements. This will typically require a minimum of 3 – 5 licensed employees to cover all shifts and days.
- Your customers will also need to be both trained and have licenses in order to acquire the products.

### **For Farmers and Hobbyists**

- You will not be able to acquire a bulk rodenticide unless you have been trained and have already obtained a certified applicator's license. Licenses may require annual renewal and fees.
- Your agricultural retailer will not be able to carry these products and thus, they will only be available at specialty locations.
- Any usage of RUPs triggers significant labor, paperwork, and reporting requirements: mandatory reporting, mandatory follow-up inspections, coordination with state regulators, audits, etc.
- Misuse of RUP's can result in fines and penalties, and in some cases criminal penalties.

### **For Agricultural Producers**

- Bulk rodenticides will only be able to be applied by licensed, certified applicators.
  - o Either your personnel will need to have a license, or you will be required to hire those that do.
- Usage of RUP products will require additional regulatory requirements such as mandatory reporting, mandatory follow-up inspections, coordination with state regulators, audits, etc.
- Misuse of RUP's can result in fines and penalties, and in some cases criminal penalties.

## **Misguided Approach Also Lacks Scientific Rigor**

The approach used by EPA to support its proposal to make all bulk rodenticides RUP's is not based upon new scientific data that demonstrates any new usage risks. Rather, the EPA is using a highly generalized and very aggressive estimation method called a Risk Quotient (RQ) as the primary evidence to support their position.

- This method uses an equation to calculate the risk of rodenticides to all mammals and birds based upon how effective it is at controlling rodents.
  - Using this methodology, no product registered today by EPA that is proven to kill rodents can meet this threshold. Said differently, the only products that would not be flagged by this Risk Quotient method are ones that wouldn't pass the EPA's own requirements for lethality of public health pests.
- The EPA asserts that **ANY and ALL** risk to 'mammals and birds' by using rodenticides is unacceptable even though rodent populations very often threaten the well-being of the very same mammal and bird populations.

**As Part of the PID Process, EPA is Required to Issue a “Use and Benefits” Assessment from Their BEAD (Biological and Economic Analysis Division) group. *EPA Seems to Discount Their Own Risk Assessment* Based on Their Recommendation to Move Forward with the Proposed Mitigation and *in Light of Their Own Quotes Below:***

- “Rodents are a substantial threat to crop and food security.”
- “Rodent-vectored diseases are a major concern in livestock production.”
- “Chemical rodenticides are a necessary part of integrated rodent management, especially in livestock and feed facilities...”
- “If livestock producers were unable to use chemical rodenticides effectively, this could result in higher costs for meat and animal byproducts... Further, large amounts of feed could be lost to rodent feeding and contamination which may increase costs of meat or animal production, translating into higher costs for the consumer.”
- “Chemical rodenticides are the fastest and most reliable way to quickly knockdown an infestation, and other methods of control... are unlikely to be effective in the face of a substantial infestation.”

**Detrimental Human Health Affects of Proposed Mitigation Measures**

- We are in the process of quantifying through review of public data that, in addition to harming food supplies, these measures will also lead to more human deaths.
- These measures will necessarily increase rodent populations and, as a result increase:
  - The number of fires caused by rodents (25% of all unexplained fires are attributed to rodents gnawing on wires)
  - Disease transmission caused by rodents (leptospirosis, hantavirus, Lyme disease, plague, etc.)
  - Chronic health problems from rodents such as asthma
- The above human health risk is contrasted with the fact that there has not been one documented accidental death due to rodenticide exposure/ingestion in the last 25 years.
- So, these measures will not reduce any deaths and will necessarily lead to MORE unintended deaths.

## Industry Comments Already Provided to EPA By The “Barnyard Coalition” on February 4, 2022

“Growers and their employees are responsible for the pest control programs on their farms. **Less than 1% of corporate farm employees** have pesticide certification. As stated previously, it is estimated that **approximately 30% of contract growers** have some form of pesticide certification.”

**Table 1. Estimated Increased Costs to the Swine and Poultry Industry Associated with All Rodenticides as RUP<sup>1</sup>**

Item	Count	Cost Each	Year One Costs	Annual Costs
Training Materials/Manuals	14,770	\$26.00	\$384,020	\$128,007
Certification Costs	14,770	\$15.00	\$221,550	\$73,850
Training/Test Hours	29,540	\$18.00	\$531,720	\$177,240
Annual Record Keeping Hours/Farm	52 hours/farm 4,200 farms	\$18.00	\$3,931,200	\$3,931,200
Estimated Initial Year/Annual Costs for Additional Training and Record Keeping for Ag ProVision Owner Companies (~ 25% of US Swine & Poultry)			<b>\$5,068,200</b>	<b>\$4,310,297</b>
Estimated Annual Costs for Additional Training and Record Keeping for all US Swine & Poultry			<b>\$20,273,960</b>	<b>\$17,241,187</b>

<sup>1</sup>Assumes certifications renewed every three years with two hours/person/renewal

## Communication and Response Tools

To aid in the communication of key information and impacts for the various user groups that will be affected, an advisory website has been made available at [www.protectthepublichealth.com](http://www.protectthepublichealth.com). In addition to providing user specific information, this website will aid those impacted by the proposed changes in the following ways:

- Provides direct links to download the full details of each PID
- Allows users to select a letter that represents their ‘voice’
- Allows users to easily submit their ‘voice’ letter to each of the affected rodenticide dockets
  - Ensuring their ‘voice’ is represented in the public comments to which EPA is required to respond
- Allows users to directly submit ‘voice’ letter to both Senate and Congressional representatives

## Summary

EPA believes that RUP status, use of respirators, mandatory carcass checks, specialized reporting requirements and the host of other use restrictions will not affect the ag industries’ ability to access and use rodenticides. It is critical that the industry helps the EPA and federal representatives understand that this is not the case and that there will be dire repercussions of these proposed mitigation measures since both the food supply and public health will suffer as a result.