Rodenticide TASK FORCE

Agriculture – Crops

				Acute Compounds			First Generation Anticoagulants (FGARs)			Second Generation Anticoagulants (SGARs)			
EPA Proposed Mitigation Category	**EPA Proposed Mitigation**	**Definition**	**Additional Information**	**Zinc Phosphide (Case No. 0026)**	**Bromethalin (Case No. 2765)**	**Cholecalciferol (Case No. 7600)**	**Chlorophacinone (Case No. 2100)**	**Diphacinone (Case No. 2205)**	**Warfarin (Case No. 0011)**	**Brodifacoum (Case No. 2755)**	**Bromadiolone (Case No. 2760)**	**Difethialone (Case No. 7603)**	**Difenacoum (Case No. 7630)**
Restricted Use Pesticide Classification	RUP classification for all FGAR, SGAR, Bromethalin, and Cholecalciferol products sold in packages ≥ 4lbs. All Zinc Phosphide products classified RUP	All commercial/professional structural products become Restricted Use Pesticides (RUPs). Cancellation of all General Use Pesticides (GUPs) for control of field pests, except for bromethalin worms for moles	RUP classification regardless of bait type. Field uses of Zinc Phosphide and FGARs are already restricted use	x	x	x	x	x	x	x	x	x	x
Application Method Prohibitions for Chlorophacinone and Diphacinone Products	Prohibit use in cropped areas including orchards, groves, vineyards, and alfalfa. Above ground applications: 1) cannot be made directly to food or feed crops, 2) can only be made during the non-growth (dormant) period of the crop, and 3) must be made along fence lines, border areas, and buffer strips adjacent to the crops. Below ground applications: 1) must be made directly into the main run of the burrow, and 2) can only be made during the non-growth (dormant) period of the crop. One year harvest interval required for applications made to non-bearing crops	Cancellation of in-crop applications of chlorophacinone and diphacinone	All food uses of FGARs prohibited. Due to these restrictions, aerial applications will also be prohibited				x	x					
	Prohibit spot/scatter and broadcast applications to rangeland, pastureland, and fallow land	Cancellation of non-bait station applications to rangeland, pastureland, and fallow land	Applications may only be made using a tamper resistant bait station in these use sites				x	x					
Application Method Prohibitions	Prohibition of spot- and broadcast- applications to turf, lawns, parks, golf courses, campsites, and other recreation areas	Cancellation of surface applications of FGARs and zinc phosphide on turf, lawns, recreation areas, other public sites with risk to children and pets	All applications to control burrowing rats (within 100 ft of a structure), moles, and field rodents, must be in tamper-resistant bait stations within those particular use sites	X			x	x	x				
Personal Protective Equipment (PPE) - Respirator	APF10 (half-face elastomeric respirators), along with any fit testing, training, and medical evaluations will be required for application of meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets	Applicator requirement to wear a respirator for loose bait formulations	Most tracking powders have respirator requirement currently. New requirement for loose formulations	x	x	x	x	x	x	x	x	x	x
Personal Protective Equipment (PPE) - Gloves	Chemical-resistant gloves required for applications of products that are meal baits, tracking powders, grain meals, and waxy/paraffinized or non-paraffinized pellets --- Updated gloves statement to be consistent with Chapter 10 of the Label Review Manual. In particular remove reference to specific categories in EPA's chemical-resistance category selection chart and list the appropriate chemical-resistant glove types to use	Cancellation of reusable consumer bait stations (1lb or less) and refills	The PPE label requirement for gloves for all products would be changed to chemical-resistant gloves, generally with a thickness ≥ 14 mils (thicker than the current standard)	x	x	x	x	x	x	x	x	x	x
Mandatory or advisory statements regarding post-application follow-up	Mandatory statements for post-application follow-up: 1) carcass search, collection, and disposal, 2) spilled/ kick out bait disposal, and 3) dead/dying non-target animal reporting requirements for RUP products packaged in ≥ 4 lbs. of bait used in fields and other non-structural use sites --- Advisory statements for post-application follow-up: 1) carcass search, collection, and disposal, 2) spilled/ kick out bait disposal, and 3) dead/dying non-target animal reporting requirements for RUP products packaged in ≥ 4 lbs. of bait used in structural use sites and for products packaged in sizes ≤ 1lb. bait labeled for consumer/residential use	For field rodent and non-structural use site applications, mandatory carcass searches and reporting requirement. For all other professional use applications, carcass search will be advisory	Structural use site applications will not require carcass searches or reporting of dead/dying non-target animals	x	x	x	x	x	x	x	x	x	x