

EPA Proposed Mitigation Category	EPA Proposed Mitigation	Definition	Additional Information	Acute Compounds			First Generation Anticoagulants (FGARs)			Second Generation Anticoagulants (SGARs)			
				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 (RUP) 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	x	x	x	x	x	x	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	Chemical-resistant glove requirement	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
Application Method Prohibitions	Prohibition of spot- and broadcast- applications to turf, lawn, 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	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				
Application Method Prohibitions	Application Method Prohibition for products packaged in quantities ≤ 1 lb. of bait labeled for consumer/residential use. Applications must be made in ready-to-use disposable bait stations. All other methods of application are prohibited, with the exception of underground baiting with formulated mole worms	Cancellation of reusable consumer bait stations (1lb or less) and refills	The only products available as General Use Pesticides (GUPs) will be ready-to-use pre-filled disposable bait stations and bromethalin worms for mole control	x	x	x	x	x	x				