October 1, 2013

Ms. Ann Prichard, Chief
Pesticide registration Branch
California EPA
Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95812

Subject: Notice of Proposed Regulatory Action – Second Generation Anticoagulant Rodenticides (SGAR’s)

Dear Ms. Prichard:

We support CDPR’s proposed regulatory action to make all second generation anticoagulant rodenticides California Restricted Materials. We would also like to reiterate the importance to include retail consumer products in addition to those products used in the professional and agricultural sectors.

We would like to make the following points:

1) California DPR data demonstrates that brodifacoum is the active ingredient which has shown to present the greatest hazard related to persistent residues in target animals and resulting impacts to non-target wildlife.

2) Referring to Table 14 in CDPR’s memorandum from Deborah Daniels to Ann Prichard dated September 19, 2012, the data show that:
   • For brodifacoum, estimated non-licensed use with products containing brodifacoum is 89%. (23.51 lb out of 26.58 lb total lb of active ingredient sold). Non-licensed applicators are homeowners, building and maintenance workers and custodians.

3) Referring to Table 15, with regards to second generation use by licensed users, the data show:
   • Licensed use of brodifacoum is 7.8% (3.07 lb out of 39.2 lb of second generation active ingredient reported used) compared to 83% for bromadiolone (32.48 lb out of 39.2 lb of second generation active ingredient reported used).

4) The above data suggest that brodifacoum use is strongly linked to non-licensed individuals (homeowners, building and maintenance workers and custodians).
5) The use of brodifacoum has been a major contributor to non-target incidents and occurrence within as shown in Tables 2 to 4 and Tables 7 through 13 of CDPR’s memorandum.

We are pleased to learn that a previously proposed exemption for consumer “indoor use only” has been removed from CDPR’s proposed rulemaking regarding restricting the use of second generation anticoagulant rodenticides in California.

Please contact me if you have any questions or would like to discuss this subject further.

Sincerely,

John Lublinkhof, Ph.D.
Director of Regulatory Affairs

Cc: Ms. Marylou Verder-Carlos, Assistant Director
    Mr. Charles Andrews, Associate Director
    Ms. Linda Irokawa-Otani (by e-mail only)