



California Notice 2018-22

POST UNTIL: December 17, 2018

NOTICE OF PROPOSED DECISION TO BEGIN REEVALUATION OF SECOND-GENERATION ANTICOAGULANT RODENTICIDES AND PUBLIC REPORT

Pursuant to Article 8, Subchapter 1, Chapter 2, Division 6 of Title 3 of the California Code of Regulations (3 CCR), the Director of the Department of Pesticide Regulation (DPR) notices the proposed decision to begin reevaluation of pesticide products containing the second-generation anticoagulant rodenticide active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone (SGARs).

Interested persons may submit comments on the proposed decision to begin reevaluation of SGARs up to and including December 17, 2018 to the Department of Pesticide Regulation, Pesticide Registration Branch, 1001 I Street, P.O. Box 4015, Sacramento, California 95812-4015. Additionally, comments can be submitted by email to <Rodenticide.Comments@cdpr.ca.gov>.

Pursuant to 3 CCR, sections 6220, 6253, and 6254, DPR hereby proposes to begin reevaluation of the SGARs brodifacoum, bromadiolone, difenacoum, and difethialone. This reevaluation would involve 15 registrants and 75 pesticide products currently registered in California. A list of products proposed to be included in the reevaluation is available upon written request to the address listed above or on DPR's Web site at: <<http://www.cdpr.ca.gov/docs/registration/reevaluation/chemicals/sgars.htm>>.

BASIS OF REEVALUATION

DPR registers SGAR pesticide products to control rodents. A target pest will consume a lethal dose of an SGAR after one feeding. However, the mechanism of action for these pesticides results in a delay between consumption of a lethal dose and death of the exposed target pest. As a result, the target pest may continue to consume the bait even after consuming a lethal dose, allowing for a concentration above the lethal dose of the SGAR to accumulate in the body of the target pest. DPR has received reports that secondary non-target exposure may occur when non-target wildlife feed on the exposed target pest.

In 1999, DPR placed pesticide products containing the SGAR active ingredient brodifacoum into reevaluation based on exposure and adverse impacts to non-target wildlife caused by persistent residue in target pests. In 2014, DPR closed the reevaluation after adopting regulations to designate the SGAR active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone as California restricted materials and to add use restrictions, in an attempt to change the use patterns of these pesticides. As a result, rodenticides containing these four active

ingredients can only be sold by licensed dealers, and can only be purchased and used by certified applicators.

After implementing these regulatory actions, DPR continued to receive reports claiming that SGARs may have caused or are likely to cause significant adverse impacts to non-target wildlife. Under 3 CCR section 6220, the Director is required to investigate such reports. The Director then has authority to begin a reevaluation if the investigation finds that the pesticide caused or is likely to cause significant adverse impacts.

DPR prepared an investigatory report (https://www.cdpr.ca.gov/docs/registration/reevaluation/2018_investigation_anticoagulant.pdf) on potential significant adverse impacts reportedly caused by anticoagulant rodenticides. The investigation reviews and analyzes information and data from a variety of sources, including peer-reviewed scientific publications, statewide sales and use reporting data, and unpublished wildlife incident and mortality data. As part of this investigation, DPR scientists analyzed 11 different studies examining the possible impacts of anticoagulant rodenticides on non-target wildlife, and 152 California Department of Fish and Wildlife (CDFW) loss reports submitted to DPR since 2014.

The investigation found that while the 2014 regulations changed SGAR use patterns by restricting their purchase, sale, and use, reported rates of non-target wildlife exposure to SGARs have not decreased. Additionally, the investigation found evidence of possible population-level impacts among non-target wildlife in California due to statistically significant associations with SGAR exposure and sublethal impacts. The investigation indicates that non-target wildlife exposure may be significant due to the chemical characteristics of SGARs, which are known to have properties of high toxicity, persistence, and bioaccumulation. The investigation also notes that brodifacoum has relatively higher rates of exposure among non-target wildlife as compared to other SGARs.

Based on the investigation, the Director finds that a significant adverse impact has occurred or is likely to occur from the use of SGARs and proposes to begin reevaluation. DPR has not yet made a final decision as to the data it will require pursuant to this reevaluation. However, in general, DPR intends to obtain data related to SGAR exposure rates as well as any resulting risk of adverse impacts to non-target wildlife.

IDENTIFICATION OF ANY SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECT THAT CAN REASONABLY BE EXPECTED TO OCCUR FROM IMPLEMENTING THE PROPOSAL

DPR is proposing to begin a reevaluation of SGARs in order to obtain relevant data. Such data would be evaluated by DPR scientists to determine if additional restrictions on use are necessary or if the pesticide should be cancelled pursuant to Section 12824, 12825 or 12826 of the Food and Agricultural Code. DPR has not identified any significant adverse environmental effect that can reasonably be expected to occur, either directly or indirectly, from implementing the proposal to begin reevaluation. Therefore, no alternatives or mitigation measures are proposed to lessen any significant adverse effects on the environment.

For information regarding the reevaluation process, please contact Ms. Brenna McNabb, by e-mail at <Brenna.McNabb@cdpr.ca.gov> or by telephone at 916-445-0179.

Original signed by Ann M. Prichard

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November 16, 2018

Date

cc: Ms. Brenna McNabb, DPR, Environmental Scientist