Second Generation Anticoagulant Rodenticides: Regulatory Requirements and Label Uses

Department of Pesticide Regulation

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

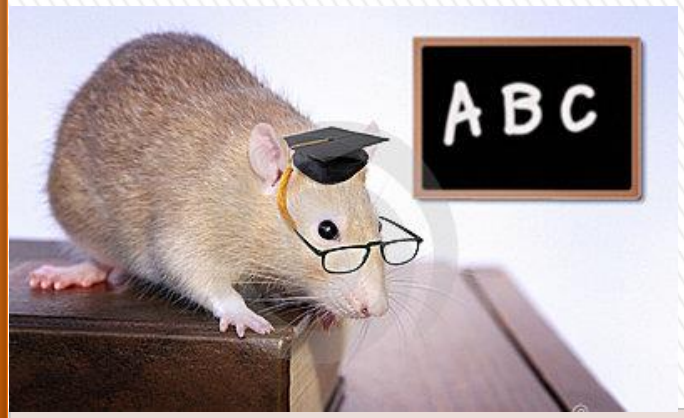
SGAR Regulation Highlights:

1. Four active ingredients were designate as California restricted materials

2. Livestock, poultry, and fish producers are able to obtain Private Applicator Certificate

3. SGAR are allowed use only within 50’ of a man-made structure (unless feature of site harbors target rodents)

4. Become effective July 1, 2014



Rodenticide Basics:
Types of Rodenticides

- **Non-anticoagulants** are acutely toxic and are formulated as either baits or fumigants
- **Anticoagulants** prevent blood clotting. Animals die after several days

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Rodenticide Basics:
1st and 2nd Generations Rodenticides

- **First Generation** are require a "multiple dose" and are less toxic:
  chlorophacinone, diphacinone, warfarin

- **Second Generation** require a "single dose" and are more toxic:
  four active ingredients (These are affected by the SGARS)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

What are the Second Generation Anticoagulant Rodenticides (SGARs) that are affected ?

Four active ingredients

1) **brodifacoum** (d-CON, Final, Havoc, Jaguar, Talon, and others . . .)
2) **bromadiolone** (Boot Hill, Brigand, Contrac, Hawk, Just One Bite, and others . . .)
3) **difenacoum** (Di-Kill, Prescription Treatment, Victor V, and others . . .)
4) **difethialone** (Generation, Hombre, and others . . .)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

What are the labeled uses for SGARs?

- **The control of commensal rodents** (Norway rat, roof rat, house mouse) …
- **… in and around buildings and other man-made structures**

Trash receptacle

Man-made structures

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Why regulate SGAR?

Environmental hazard:

Predatory mammals and birds are exposed by eating rodents that may have consumed SGAR.

- DPR reviewed 492 wildlife deaths 1995-2011
- **73%** had residues of at least one SGAR

Household rat poison linked to death and disease in wildlife

Los Angeles Times

April 16, 2014, 9:33 PM

The mountain lion known as P-22 looked majestic just a few months ago, in a trail-camera photo shot against the backdrop of the Hollywood sign.

But when a remote camera in Griffith Park captured an image of the puma more recently, it showed a thinner and mangy animal. Scientists sedated him and drew blood samples. They found evidence of exposure to rat poisons.

Anticoagulants Found In Three Dead Bobcats In Santa Cruz

Location: At or near UC Santa Cruz Arboretum

- **9/2/2014 Bobcat A -** (female) - captured at arboretum dies after being captured. Necropsy: 0.12ppm Brodifacoum, Trace Bromadiolone and Diphacinone

- **9/9/2014 Bobcat B** – killed by vehicle near arboretum.

  Necropsy: 0.12ppm Brodifacoum, 0.14 ppm Bromadiolone and Trace of Diphacinone

- **12/4/2014 Bobcat C -** killed by vehicle near UC Santa Cruz.

  Necropsy: 0.42ppm Brodifacoum, 0.064ppm bromadiolone, and trace of Diphacinone

Media Coverage of Bobcat Deaths

Affected Mother Bobcat and Kitten

3/ KGO-TV (ABC): Traces of poison detected in bobcats found dead near UC Santa Cruz

SANTA CRUZ, Calif. (KGO) -- Bobcats are dying near the University of California Santa Cruz. Three cats in as many months have died and new necropsy reports show they all had poison in their blood. Read more:

http://abc7news.com/news/poison-detected-in-bobcats-found-dead-near-uc-santa-cruz/474272/

Other Santa Cruz Wildlife Deaths

- **March 2, 2015-** A grounded **Peregrine Falcon** found in Santa Cruz County. Died March 25. Cause of death avian cholera but tissue contained trace amounts of Brodifacoum.

- **May 3, 2015** - **Barn Owl** that was unable to fly found near the UC Santa Cruz Arboretum. Avian cholera was diagnosed in this owl as well as exposure to two anticoagulant rodenticides. (0.020 ppm Brodifacoum and trace Chlorphacinone)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

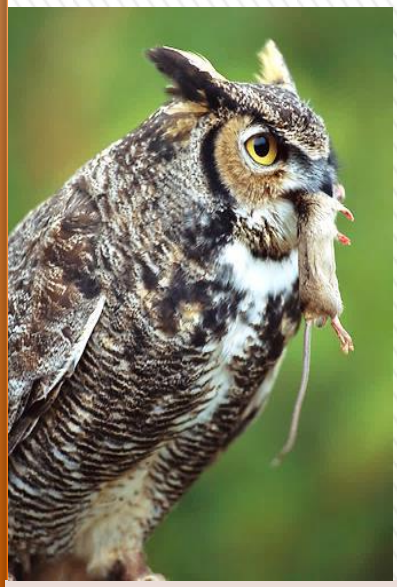
Why are SGARs so hazardous to wildlife?

Combination of two SGAR's features:

1. **High toxicity** (more toxic than 1st-generation anticoagulants and persist longer inside a living animal), but…
2. … take **several days** to kill a rodent

The result: Rodents that have eaten a "lethal" dose of SGAR bait roam and may be taken as prey.

Second Generation Anticoagulant Rodenticides Regulations (SGAR)



To protect wildlife while controlling rodents, regulations were adopted which:

a) Designated four SGARs as CA-restricted materials

b) Allowed livestock, poultry, and fish producers to obtain Private Applicator Certificate

c) Allowed SGAR use only within 50' of a man-made structure (unless a feature of the site harbors target rodents)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

a) Designation of four SGARs as CA-restricted

SOME QUESTIONS:

Who may sell SGARs? Only licensed Pest Control Dealers

Who may buy ("possess") SGARs?

a) Certified commercial applicators – ag (QAL/QAC) or structural,

or

b) Person under their direct supervision - -

c) Certified private applicators (PAC) engaged in production ag, (addressed in next slide)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

a) Designation of four SGARs as CA-restricted

SOME QUESTIONS:

Do buyers need a restricted materials permit? **YES/NO**

Yes - for most buyers/users, must provide a copy your permit

No - for structural licensees

Who may use SGARs? Same as for “Who may buy

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

b)The Definition of "*Private Applicator*" in 3 CCR 6000 was amended to:

"Allow livestock, poultry, and fish producers to obtain Private Applicator Certificate."

Definition "*Private Applicator*" is: **(a)** an individual who uses or supervises the use of a pesticide for the purpose of producing an agricultural commodity as defined by Title 40 Code of Federal Regulations, section 171.2(a)(5)

40 CFR 171.2 (a) (5)

includes production of **"animal, or animal product"**

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

PAC definition does not include use on residences for rodent control. (no change)

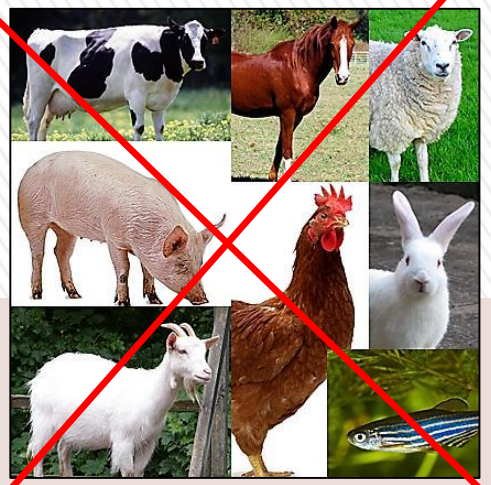
"**Private Applicator**" is:

(b) a householder who uses or supervises the use of a pesticide, outside the confines of a residential dwelling for the purpose of **controlling ornamental plant or turf pests on residential property** owned, leased, or rented by that householder." (no change)

Label of SGARs do not include controlling plant pests

CACs: SGARs **will not be added to a Restricted Materials Permit for householders** (including ranchettes) who hold a PAC.

Second Generation Anticoagulant Rodenticides Regulations (SGAR)



For purposes other than PAC, California will retain its <u>own</u> definition of "agricultural commodity"
[3CCR 6000]

"Agricultural commodity," for the purpose of this chapter, means an unprocessed product of farms, ranches, nurseries and forests (**except livestock, poultry and fish**). Agricultural commodities include fruits and vegetables; grains …

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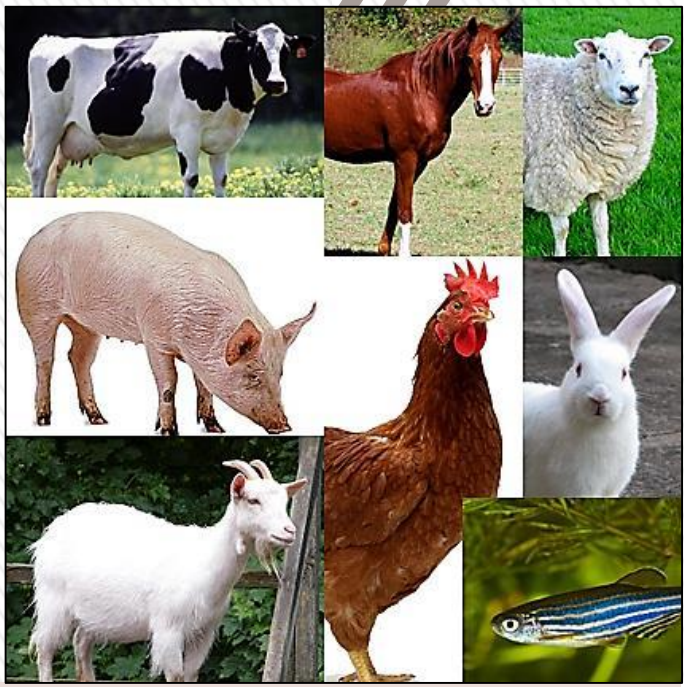


As a result of the PAC change:

Livestock, poultry, and fish producers will be:

- Eligible for a Private Applicator Certificate (new), and can obtain a SGAR restricted materials permit
- Can continue to report pesticide use on a Monthly Summary form (no change).

CDPR definition of "Agricultural Commodity" [in 3CCR 6000] will continue to determine how you must report pesticide use

3CCR 6626 Pesticide Use Reports for Production Agriculture

"(a) The operator of the property **which is producing an agricultural commodity** [3CCR 6000] shall report . . . " the date, time, location, and amount of each application

3CCR 6627 Monthly Summary Pesticide Use Reports

Monthly Summary Use Report only require total applications and the amount used during the entire month.

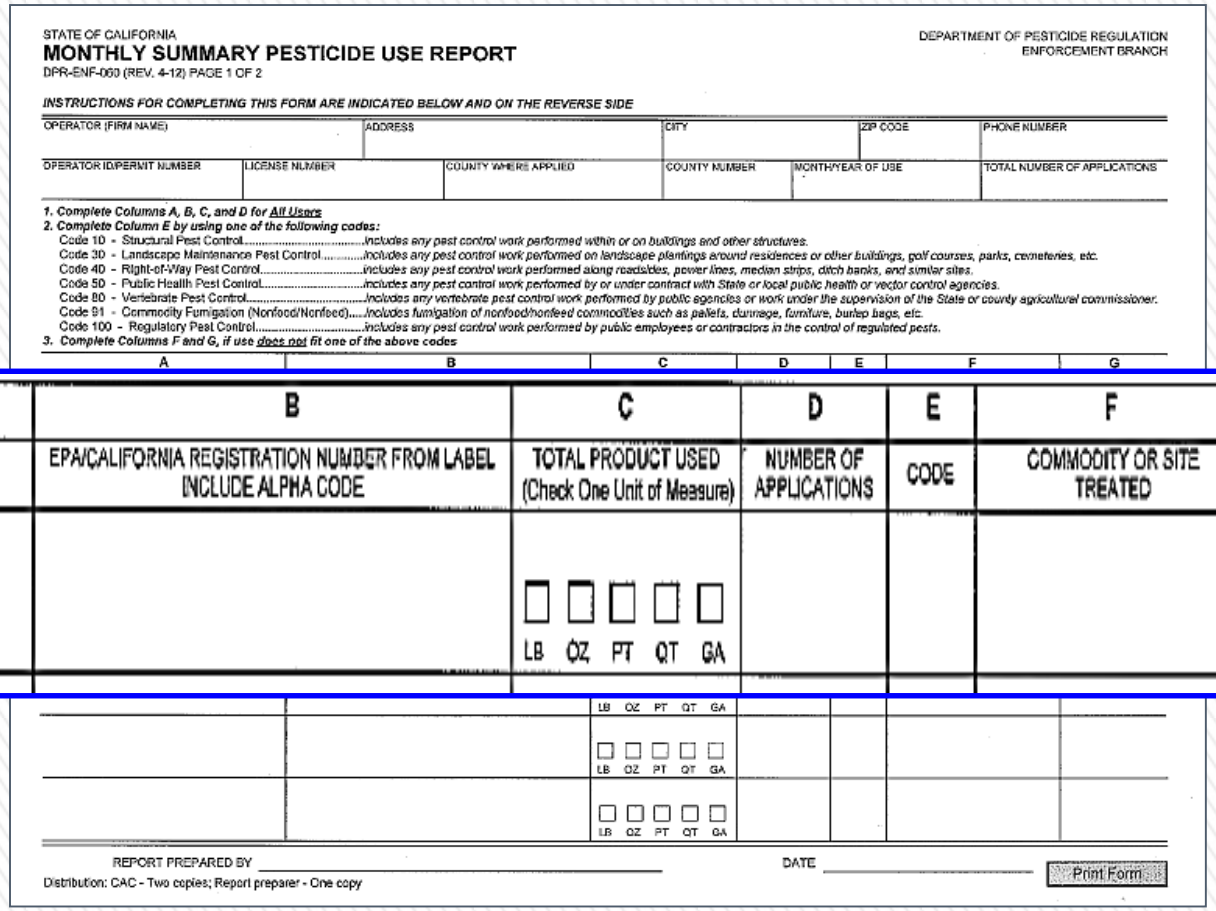
Q: If a fish/livestock/poultry producer applies a SGAR, may he/she submit a use report using Monthly Summary form?

A: **YES**, because, as defined in 3CCR 6000, they are not producing an "agricultural commodity" (no change)

Reporting of SGAR's

3CCR 6627 Monthly Summary Pesticide Use Reports

All SGAR must be reported on Monthly Summary Use Report which includes total applications and the amount used during the entire month. (Date, time, site number , or location is not required on the monthly summary use report)



STATE OF CALIFORNIA
MONTHLY SUMMARY PESTICIDE USE REPORT
DPR-ENF-060 (REV. 4-12) PAGE 1 OF 2

DEPARTMENT OF PESTICIDE REGULATION
ENFORCEMENT BRANCH

INSTRUCTIONS FOR COMPLETING THIS FORM ARE INDICATED BELOW AND ON THE REVERSE SIDE

OPERATOR (FIRM NAME)	ADDRESS	CITY	ZIP CODE	PHONE NUMBER

OPERATOR ID/PERMIT NUMBER	LICENSE NUMBER	COUNTY WHERE APPLIED	COUNTY NUMBER	MONTH/YEAR OF USE	TOTAL NUMBER OF APPLICATIONS

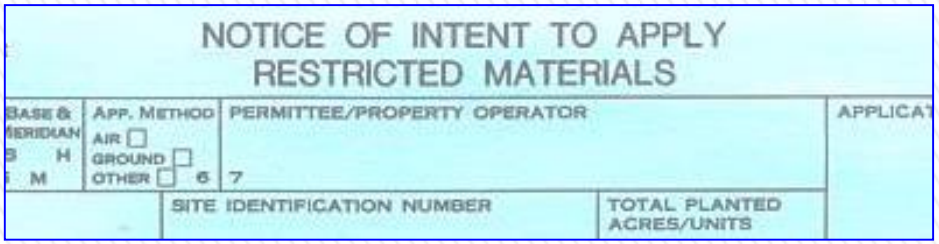
1. *Complete Columns A, B, C, and D for All Users*
2. *Complete Column E by using one of the following codes:*
   - Code 10 - Structural Pest Control.....*includes any pest control work performed within or on buildings and other structures.*
   - Code 30 - Landscape Maintenance Pest Control.....*includes any pest control work performed on landscape plantings around residences or other buildings, golf courses, parks, cemeteries, etc.*
   - Code 40 - Right-of-Way Pest Control.....*includes any pest control work performed along roadsides, power lines, median strips, ditch banks, and similar sites.*
   - Code 50 - Public Health Pest Control.....*includes any pest control work performed by or under contract with State or local public health or vector control agencies.*
   - Code 80 - Vertebrate Pest Control.....*includes any vertebrate pest control work performed by public agencies or work under the supervision of the State or county agricultural commissioner.*
   - Code 91 - Commodity Fumigation (Nonfood/Nonfeed).....*includes fumigation of nonfood/nonfeed commodities such as pallets, dunnage, furniture, burlap bags, etc.*
   - Code 100 - Regulatory Pest Control.....*includes any pest control work performed by public employees or contractors in the control of regulated pests.*
3. *Complete Columns F and G, if use does not fit one of the above codes*

A	B	C	D	E	F	G
MANUFACTURER AND NAME OF PRODUCT APPLIED	EPA/CALIFORNIA REGISTRATION NUMBER FROM LABEL INCLUDE ALPHA CODE	TOTAL PRODUCT USED (Check One Unit of Measure)	NUMBER OF APPLICATIONS	CODE	COMMODITY OR SITE TREATED	ACRES/UNITS TREATED
		☐ LB ☐ OZ ☐ PT ☐ QT ☐ GA				
		☐ LB ☐ OZ ☐ PT ☐ QT ☐ GA				
		☐ LB ☐ OZ ☐ PT ☐ QT ☐ GA				

REPORT PREPARED BY _____ DATE _____ Print Form

Distribution: CAC - Two copies; Report preparer - One copy

Second Generation Anticoagulant Rodenticides Regulations (SGAR)


NOTICE OF INTENT TO APPLY
RESTRICTED MATERIALS

BASE & MERIDIAN S H M	APP. METHOD AIR ☐ GROUND ☐ OTHER ☐ 6	PERMITTEE/PROPERTY OPERATOR 7	APPLICA
	SITE IDENTIFICATION NUMBER	TOTAL PLANTED ACRES/UNITS	

Is a Notice of Intent (N.O.I) required for the use of the second generation rodenticides? YES

1) An N.O.I. is required for a restricted materials permit for **agricultural use (Production Ag and Non- Production Ag)**.
2) **Livestock, poultry, and fish producers** - are **considered non- production agricultural** and require a restricted materials permit.
3) As stated in *CCR 6428. Agricultural Permit Applications*, if the required information to complete the RMP is not provided on the RMP, it must be included in an N.O.I. (date, time, rate)
4) ***Only Non-Agricultural Use permits do not require an N.O.I. (CCR 6430)***
5) **Some CAC's may allow an N.O.I. schedule for SGAR's.**

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

c) Allow use <u>only within 50'</u> of a man-made structure (new 3 CCR 6471).

- Many SGAR labels allow within <u>100</u>
- New regulation is <u>more restrictive</u> than those labels

(This section supplements the label restrictions on the use of brodifacoum, bromadiolone, difenacoum, and difethialone.)

<u>New 3 CCR 6471</u>:

a) It is prohibited to place any above ground bait more than 50 feet from a man-made structure unless there is a feature associated with the site that is **harboring or attracting** the pests targeted on the label between the 50-foot limit and the placement limit specified on the label."

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Many SGAR labels allow use <u>within 100'</u> of a man-made structure

(new regulation is <u>more restrictive</u> than labels)

<u>Statement from a SGAR product label:</u>

". . . man-made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations. **Examples of such structures include** homes and other permanent or temporary residences, food processing facilities, industrial and commercial buildings, **trash receptacles**, agricultural and public buildings, **transport vehicles (ships, trains, aircraft), docks and port of terminal buildings** and related structures around and associated with these sites. **Fence and perimeter baiting, beyond 100 feet from a structure as defined above, is prohibited."**

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Would the new regulation allow use <u>within 50'</u> of a trash receptacle?

Trash receptacle

SGAR bait

Yes. Trash receptacle is a "man-made structure", and SGAR is within 50 feet of the trash receptacle.

(cont.)

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Would the new regulation allow use <u>within 100'</u> of a man-made structure?

Man-made Structure

SGAR bait

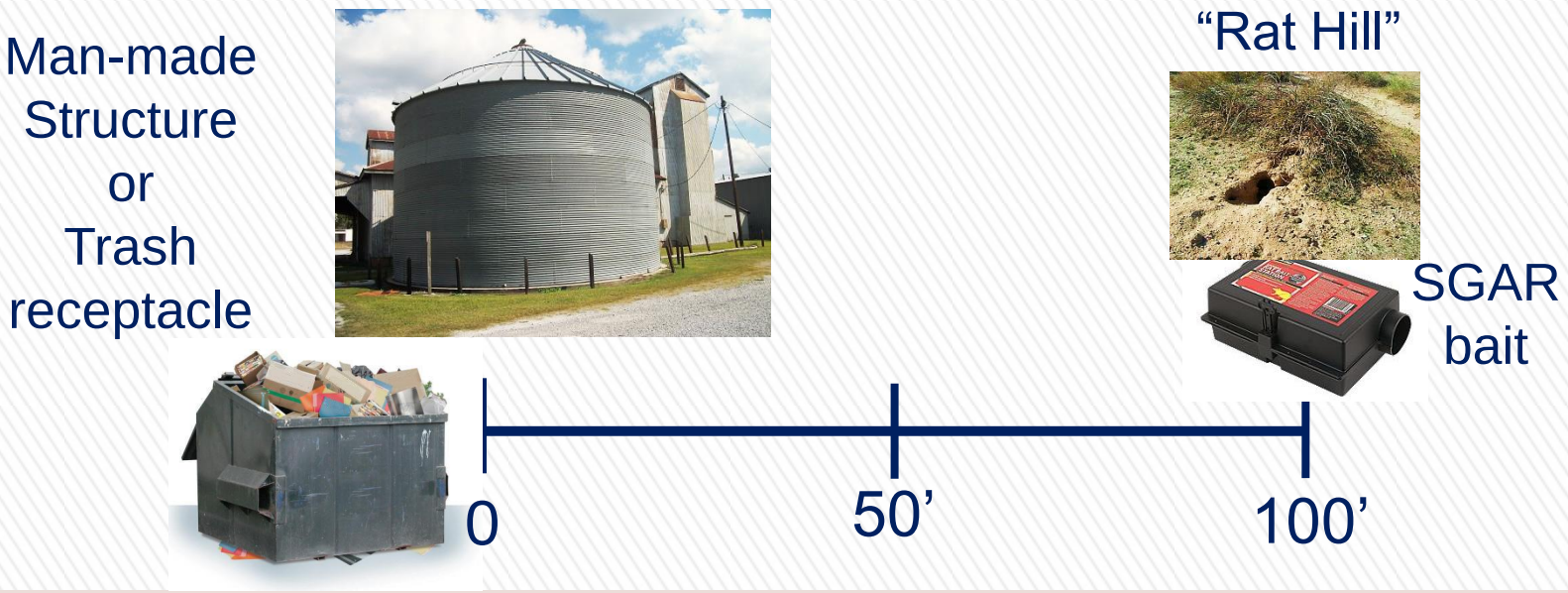
Trash receptacle

0 50' 100'

No. Trash receptacle is a "man-made structure", but SGAR is more than 50' from the trash receptacle.

Second Generation Anticoagulant Rodenticides Regulations (SGAR)

Would the new regulation allow this use?



Yes, <u>if</u> "Rat Hill" harbors commensal rodents.

SGAR is more than 50' from any man-made structure, **<u>but</u>** there is "a feature of the site that is harboring or attracting the pests targeted on the label", <u>and</u> application is within the placement limit specified on the label (100').

DPR is alerting stakeholders

Mass mailings (separate letters) to:

- Registrants of SGARs
- Pest Control Dealers licensed by DPR
- Pest Control Dealers licensed by DPR
- Retailers and grocers associations
- End users (SPCB, Farm Bureau, many other groups)
- County Agricultural Commissioners

Fact sheet for retailers

Summary:

SGAR Regulations

(effective date July 1, 2014)

1. **Designate four active ingredients as CA-restricted materials**

2. **Allow livestock, poultry, and fish producers to obtain Private Applicator Certificate**

3. **Allow SGAR use <u>only within 50'</u> of a man-made structure (unless feature of site harbors target rodents)**

The End