

Way back when...

Rodenticide Risk Mitigation A story of working together

AAPCO Annual Conference – March 2026
Industry Relations Forum Panel
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Remember
when...



myspace



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2008
EPA released the
Risk Mitigation
Decision
for 10
Rodenticides



FEDERAL REGISTER

The Daily Journal of the United States Government



Notice

Rodenticides Final Risk Mitigation Decision; Notice of Availability

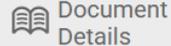
A Notice by the Environmental Protection Agency on 06/04/2008



PUBLISHED DOCUMENT: E8-12493 (73 FR 31868)



PDF



Document
Details



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Related
Documents

DOCUMENT HEADINGS

Environmental Protection Agency
[EPA-HQ-OPP-2006-0955; FRL-8367-8]

AGENCY:

Environmental Protection Agency (EPA).

A Slow Response

- Did not rise until registrants were working on label changes
- Questions on requirements
- 2011 before significant action by industry and discussion by states
 - SFIREG update from ASPCRO

Rodenticides

- Re-registration process during 1990s in for 10 rodenticide active ingredients
 - Commensal rodents – Norway rat, roof rat, house mouse
- RED indicated need to:
 - Minimize children's exposure in homes
 - Reduce wildlife exposure and ecological risks
- Risk mitigation Decision of 10 Rodenticides

Risk Mitigation Decision

- Children's Risk Mitigation
 - For products for sale to consumers:
 - Prohibit loose bait formulations
 - Bait station requirement
 - 4 Tiered system
- Ecological Risk Mitigation
 - For 2nd generation - SGARs
 - Sale and distribution restrictions
 - Minimum package sized requirements
 - Use site restrictions

**Agreement on bait station and consumer
limitations**

But what else?

What were the issues?

Issues for Regulators and Industry

Regulators:

- Control of distribution and sale for general use products
 - Availability of resources to monitor compliance in the marketplace
 - Non-commensal rodent public health concerns, primarily Western states
-

Industry:

- 50 ft. limitation conflicted with practices for sanitation, food safety and pest management
- Definition of building
- Product availability
 - Distribution concerns
 - Non-Commensal rodent

- ✓ States
 - ASPCRO, AAPCO, SFIREG
- ✓ Industry
 - PMPs and Ag
- ✓ Registrants
- ✓ EPA

The Players



ASPCRO Efforts continued

- Discussions with:
 - EPA
 - Explained conditions and reasons
 - Very receptive to consideration of proposed alternatives to some things
 - NPMA
 - Provided information from PMPs
 - Registrants
 - Products and label changes

Ad Hoc Committee formed

- Re-Evaluation Division agreed to review proposal developed by group
 - Stated would consider science basis for changing
 - Consider other distance or restrictions
- NPMA, ASPCRO, Registrants, PMP, Food Processor Industry Rep., Bobby Corrigan
- Met in DC in September
- EPA considering proposal

Ad Hoc Recommendations

1. Allow for placing rodent bait a realistic distance away from buildings based on recent new research/science of a Norway rats home range (upwards to 450 ft.) in urban environments.
2. Consider the term 'structure' with prohibitions rather than the term 'building'
3. Prohibit baiting further than 450 feet from buildings or structures, unless an active infestation is confirmed.
 - addresses the indiscriminate baiting of fence rows
 - prevents indiscriminate baiting under the umbrella of "preventative maintenance baiting"

Ad Hoc Recommendations

3. Mandates all exterior bait stations be of tamper-resistant category and that the bait inside the stations be secured to reduce the likelihood of bait migration out of the stations into the environment due to rodent translocation.
4. Prohibits stuffing packets and blocks down rat holes (as often they come right back up and thus present direct exposure to pets, children, wildlife mammals and birds, environmental wash off, etc.)

EPA Initial Response

- 450' was a shocker
 - Said then product use labeled for field uses
 - Indicated not allowable for distances still in urban settings
- Considering use of structure
- OK with securing bait and placement requirements
- May consider documentation of monitoring requirement
- Working on another version

ASPCRO Efforts



- Letter Sent to EPA November 7, 2011
 - Focused on proposed changes to ‘within 50 feet of buildings’ statement
 - Allow consideration of 100 foot as distance
 - Replace the term ‘building’ with ‘man-made structure’
- EPA training – November 15-16, 2012
 - ‘show and tell’ on rodenticide, bedbug, ag/urban interface and school IPM program issues
 - National Zoo
 - Open air ‘structures’, constructed rock outcroppings, gate motor housings in large animal areas

EPA Response to ASPCRO letter

- March 2013
- Agency altered 50 foot restriction and adopt burrow baiting restrictions proposed by Ad Hoc group.
- Ongoing label changes by Registrants to new language
 - Applicators must follow label on product which may contain old RMD language



ASPCRO's Capabilities as a Partner

- Benefit is ability to 'survey' states which the agency can not easily accomplish
- Awareness of 'experts' and those most knowledgeable to address questions of the Agency
- Ability to establish committees when needed to assist in solutions to shared issues or efforts with the Agency.
- Training for the agency where expertise is limited or beyond the models or data ability to demonstrate

Partnership Capabilities

- 1. Everyone at the table**
- 2. Each played a role**
Survey, Training, Expertise
- 3. A Workable Solution Achieved**

Thank You

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