



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

February 13, 2023

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket No. EPA-HQ-OPP-2017-0750; Proposed Interim Decision for Rodenticides – (Brodifacoum, Case No. 2755 | Bromadiolone, Case No. 2760 | Bromethalin, Case No. 2765 | Chlorophacinone, Case No. 2100 | Cholecalciferol, Case No. 7600 | Difenacoum, Case No. 7630 | Difethialone, Case No. 7603 | Diphacinone, Case No. 2205 | Strychnine, Case No. 3133 | Warfarin, Case No. 0011 | Zinc Phosphide, Case No. 0026)

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Many of our members rely on rodenticides to protect their crops, land, equipment, and infrastructure. Our comments are in response to the Environmental Protection Agency's (EPA) Proposed Interim Decision (PID) for Rodenticides.

Rodenticides are used by both farmers and ranchers to address rodents such as mice, rats, gophers, and squirrels that can wreak havoc in a number of areas of a farm or ranch. Rodenticides help farmers control these pests when they infiltrate structures that house equipment, feed, or animals. In these situations, rodents can damage farm equipment and create unsanitary conditions for both feed and livestock. In other situations, where crops are processed or stored, rodents pose food safety hazards. In field crops, as well as in pasture and rangelands, gophers' and squirrels' burrowing activities damage fields and crops and create hazards for both humans and livestock. Furthermore, they can also cause serious and costly damage to irrigation systems, including canals and drip irrigation systems.

A number of EPA's proposals in the rodenticides (PID) would impede access and create greater costs for the control of rodents on farms and ranches.

Classifying Specific Anticoagulant Rodenticide as Restricted Use Pesticides

EPA is proposing to classify all First Generation Anticoagulants (FGAR) (i.e. Chlorophacinone, Diphacinone, Warfarin) and Second Generation Anticoagulants (SGAR) (i.e. Brodifacoum, Bromadiolone, Difenacoum, Difethialone) products packaged in quantities of ≥ 4 lbs. as restricted use pesticides (RUPs).

In doing so, the sale and use of these products would be restricted to certified applicators or those under their direct supervision. There will be many farmers and ranchers impacted by this requirement, especially those who do not already work with a commercial applicator. Under EPA's current proposal these farmers and ranchers would be required to obtain a Private Applicator Certification in order to purchase and use RUP rodenticides, if they do not already have this certification or work with a commercial applicator.

The task of obtaining a Private Applicator Certification takes time and money. In Arizona the cost of this certification is \$50 and must be renewed annually. Furthermore, testing and the completion of three continuing education credits per year is required. Currently, testing for the Private Applicator Certification is only available in three locations in Arizona, which can pose significant travel time in addition to other certification costs. The certification requirement would be even more burdensome for smaller operators who have more limited economic and labor resources.

The RUP proposal will result in many farmers and ranchers losing the ability to obtain rodenticide products in a timely manner. These delays would allow the rodent populations to increase, causing further economic damage to crops, fields, and equipment.

Application Limitation of FGARs

Specific to the FGAR products Chlorophacinone and Diphacinone, EPA is proposing certain prohibitions to cropped areas including orchards, groves, vineyards, and alfalfa. Notable is the requirement that above ground and below ground applications can only be made during the non-growth (dormant) period of the crop. This particular limitation would essentially eliminate the use of FGAR products used to control gophers in Arizona alfalfa fields. In central Arizona, weather conditions are such that there is no dormant period and in other areas the dormant period is very limited. Regardless of the dormant period, farmers are cognizant of gopher and squirrel populations year-round. If these rodents are present, then they must be dealt with otherwise their population and the resulting damage increases.

Arizona is extremely productive and unique when it comes to alfalfa production. According to USDA data from 2021, there were 305,000 acres of alfalfa harvested that produced 2.42 million tons valued at \$494 million. Arizona growers have the highest alfalfa yields in the nation, with 8.2 tons per acre on average, compared to about 7.1 tons per acre in California. The national average is 3.2 tons per acre.¹ Thus, the continued use of rodenticides to protect yields, fields, and infrastructure from gopher and squirrel infestations in a timely manner is critical and an important tool to protect growers' economic interests. However, EPA's proposal severely hinders this ability.

Personal Protective Equipment

Evaluating the need for personal protective equipment (PPE) to protect those working with pesticides and/or rodenticides is important for ensuring the health and safety of those individuals. EPA's proposal for rodenticides includes the requirement of a respirator along with fit testing, training, and medical evaluation for applications of meal baits, tracking powders, grain meals, and waxy, paraffinized or non-

¹ Keppen, Dan and Mike Wade. "Our Food Supply at Risk – White Paper on the Importance of Alfalfa Production in the American West" November 15, 2022. Available online at: <https://www.farmwater.org/farm-water-news/release-our-food-supply-at-risk-white-paper-on-the-importance-of-alfalfa-production-in-the-american-west-copy/>.

paraffinized pellets. EPA needs to provide the rationale for this level of inhalation protection, as the rationale provided in the PID is unclear. Additionally, the reported occupational exposure data does not always specify the active ingredient and circumstances of the exposure or that exposure occurred while the label was being followed. The expense of a respirator and the associated medical evaluation and fit testing should only be required if in fact there is valid data to support the need for it.

Another PPE requirement proposed in the PID is the use of 14 mil gloves. Again, EPA should only require these gloves if there is valid data indicating they are needed to protect applicators.

Mandatory Carcass Search

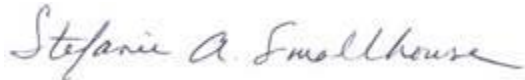
EPA is proposing mandatory post-application follow-up carcass search, collection, and disposal requirements for FGAR products classified at RUPs registered for use fields. This mandate will require the search of carcasses at the application site and surrounding areas beginning 4 days after the first application and at subsequent intervals of 1 to 2 days for at least two-weeks after the last bait application. EPA recognizes that this mitigation measure will increase the cost of rodent control by increasing the time, labor, and fuel for onsite returns. The agency further acknowledges that there are alternative methods that affected individuals may use, such as mechanical trapping and fumigation, but that these alternative methods may not be as effective. However, it does not appear that EPA has fully evaluated the economic impact this mitigation measure would have on agricultural operations including the additional labor for carcass searches or the additional costs that will be borne by using alternative methods which are not always as effective or suitable for certain agricultural settings (i.e., trapping across large expanses of land).

Conclusion

Rodenticides are at times necessary to effectively control rodents that can cause crop damage, food safety hazards, and potential harm to humans, livestock and farm equipment. Although EPA is not proposing the cancellation of rodenticide use in the PID, many of the proposed restrictions and mitigations will essentially make the continued use of these products unworkable for agricultural producers in their efforts to control rodents effectively and efficiently on their farms and ranches. We urge EPA to consider our concerns before it moves forward with finalizing the rodenticide PID to ensure these products remain a viable option for those who produce the food and fiber of our nation.

As a member of the American Farm Bureau Federation, we support and incorporate by reference the comment letter they have submitted to this docket which raises additional concerns regarding EPA's rodenticide PID.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse".

Stefanie Smallhouse, President
Arizona Farm Bureau Federation