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## QUESTIONS AND ANSWERS REGARDING RODENTICIDES

*Prepared by the  
Rodenticide Registrants Task Force  
June 25, 2004*

*This Q&A discusses issues brought before the U.S. Environmental Protection Agency (EPA) in response to the EPA reregistration process for the rodenticide "cluster," and includes background on the Rodenticide Registrants Task Force (RRTF), the Rodenticide Cluster Reregistration Eligibility Decision (RED), EPA's Rodenticide Stakeholder Workgroup (RSW), and EPA's Preliminary Comparative Assessment of Rodenticides.*

### ***What is the Rodenticide Registrants Task Force (RRTF)?***

The RRTF is a coalition of rodenticide registrants, including the manufacturers of the following active ingredients: brodifacoum, bromadiolone, bromethalin, chlorophacinone, cholecalciferol, difethialone, diphacinone (and its sodium salt), pival (and its sodium salt), red squill (scilliroside), warfarin (and its sodium salt), and zinc phosphide. RRTF members include the following companies, which comprise almost 80% of domestic rodenticide production: Bacon Products; Bell Laboratories; HACCO, a NEOGEN Company; Liphatech; Reckitt Benckiser; and Syngenta Crop Protection. The California Department of Food and Agriculture also is a member.

### ***Why did the RRTF form?***

The RRTF was formed in 1999 in response to the U.S. Environmental Protection Agency's (EPA) 1998 issuance of the Rodenticide Cluster Reregistration Eligibility Decision (RED) addressing rodenticides considered for reregistration.

### ***What public health benefits do rodenticides offer?***

Rodenticides provide consumers with economical and effective control of disease-bearing pests in residential and commercial settings. Rodents negatively impact public health and the economy. Approximately 14,000 rodent bites are reported annually in the United States. The Centers for Disease Control and Prevention (CDC) reported in June 1999 that, in 1970-71, it collected data suggesting that large cities experience 10 rat bites per 100,000 people per year. Between 1986 and 1994, 809 non-work related rat bites were reported to the New York City Department of Health. In Philadelphia, 264 rat bites were reported from 1985-1996. One-third of the rat bites (32%) reported to CDC occurred in children under the age of nine. On average, there were 16 rat bites per 100,000 children under age five per year during this time

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period. A copy of CDC's 1999 presentation is available at <http://www.lawbc.com/rrtf/RodenticideBenefits-APublicHealthPerspective.pdf>. According to Dr. Robert Corrigan, rodent expert, "[i]n the US, it is estimated that up to 50,000 people are bitten each year by rats, the majority being children." Corrigan, R.M. (2001). "Rodent Control -- A Practical Guide for Pest Management Professionals," PCT/GIE Media, at 18; *see also* <http://www.lawbc.com/rrtf/CorriganPresentation.pdf>. More information about how rodents cause these diseases is available at the CDC website, including at the following links: <http://www.cdc.gov/ncidod/diseases/hanta/hps/index.htm>; <http://www.cdc.gov/ncidod/diseases/hanta/hps/noframes/rodents.htm>; <http://www.cdc.gov/nasd/docs/d001601-d001700/d001651/d001651.html>; <http://www.cdc.gov/ncidod/EID/vol10no3/03-0431.htm>; [http://www.cdc.gov/ncidod/dbmd/diseaseinfo/leptospirosis\\_g.htm](http://www.cdc.gov/ncidod/dbmd/diseaseinfo/leptospirosis_g.htm); <http://www.cdc.gov/ncidod/dvrd/spb/mnpages/dispages/vhf.htm>; <http://www.cdc.gov/ncidod/dpd/parasites/toxoplasmosis/ToxoWomen.pdf>; <http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5206a1.htm>; <http://www.cdc.gov/ncidod/dvrd/spb/mnpages/dispages/lcmv.htm>; and <http://www.cdc.gov/ncidod/eid/vol1no4/barton.htm>.

In addition to the large numbers of rat bites, rodents directly cause Hantavirus pulmonary syndrome (HPS) (severe pneumonia), leptospirosis (an influenza-like illness), trichinosis (nausea, diarrhea, muscle aches), and rat-bite fever (also influenza-like) -- all of which can be fatal. Indeed, according to CDC, nearly half of all cases of Hantavirus are fatal. Rodents also directly cause several other diseases, including salmonellosis (nausea, diarrhea), yersinia pseudotuberculosis (diarrhea, abdominal pain, possibly arthritis), lymphocytic choriomeningitis (influenza-like symptoms, meningitis), and toxoplasmosis (miscarriage). More information about how rodents cause these diseases is available at the CDC website, including at the following links: <http://www.cdc.gov/ncidod/diseases/hanta/hps/index.htm>; <http://www.cdc.gov/ncidod/diseases/hanta/hps/noframes/rodents.htm>; <http://www.cdc.gov/nasd/docs/d001601-d001700/d001651/d001651.html>; <http://www.cdc.gov/ncidod/EID/vol10no3/03-0431.htm>; [http://www.cdc.gov/ncidod/dbmd/diseaseinfo/leptospirosis\\_g.htm](http://www.cdc.gov/ncidod/dbmd/diseaseinfo/leptospirosis_g.htm); <http://www.cdc.gov/ncidod/dvrd/spb/mnpages/dispages/vhf.htm>; <http://www.cdc.gov/ncidod/dpd/parasites/toxoplasmosis/ToxoWomen.pdf>; <http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5206a1.htm>; <http://www.cdc.gov/ncidod/dvrd/spb/mnpages/dispages/lcmv.htm>; and <http://www.cdc.gov/ncidod/eid/vol1no4/barton.htm>.

Further, rodenticides indirectly reduce infestations of mites, ticks, fleas, and other biting insects that are harbored and spread by rodents. Those arachnids and insects cause plague, rickettsialpox, Colorado tick fever, Rocky Mountain spotted fever, Lyme disease, relapsing fever, babesiosis, western equine encephalitis, California encephalitis, murine typhus, human granulocytic ehrlichiosis, and cutaneous leishmaniasis. Over half of untreated plague cases are fatal, and Rocky Mountain spotted fever, relapsing fever, babesiosis, and human granulocytic



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ehrlichiosis may all be fatal. These diseases are discussed further in CDC's presentation at <http://www.lawbc.com/rtrf/RodenticideBenefits-APublicHealthPerspective.pdf>.

Finally, rodenticides also reduce the potential for asthma and allergies caused by rat and mice dander and waste. CDC's website provides further information about this connection at <http://www.cdc.gov/niosh/animalrt.html> and [http://www.cdc.gov/nceh/airpollution/asthma/interventions/inner\\_city\\_asthma.htm](http://www.cdc.gov/nceh/airpollution/asthma/interventions/inner_city_asthma.htm), as does a 1999 article by rodent expert Dr. Robert Corrigan ("Mice Just as Important as Roaches in Allergy Studies," *Pest Control Technology* (May 1999) at 110).

### ***What other benefits do rodenticides offer?***

Rodenticides also provide important benefits to property, the environment, and the economy. In a presentation to the Rodenticide Stakeholders Workgroup (RSW) in June 1999, Dr. Corrigan stated that in 1982, rats destroyed over 42 million tons of food worth 30 billion dollars. See <http://www.lawbc.com/rtrf/CorriganPresentation.pdf>. In addition, rodents consume and contaminate animal feed and spread diseases to pigs and poultry, negatively impacting the efficiency of intensive livestock production. Rats can exert up to 7,000 psi with their incisors and can bite repeatedly up to six times per second. See <http://www.lawbc.com/rtrf/CorriganPresentation.pdf>. The constant gnawing of rodents destroys property, and rodents are thought to account for 50% of fires of unknown origin due to chewing electrical wiring. See <http://www.lawbc.com/rtrf/CorriganPresentation.pdf>. Rodenticides protect agricultural crops in the field from damage due to field rodents such as ground squirrels, voles, and native mice and rats. Rodents account for a large fraction of the total vertebrate pest damage to crops. In California, rodent damage to crops is estimated to be in excess of \$200 million per year. See California Food and Agriculture Code, Section 6025(b) ("(b) Vertebrate pests cause an estimated two hundred million dollars (\$200,000,000) damage to agricultural crops each year, and without effective controls, the losses and damage could reach one billion dollars (\$1,000,000,000) annually.").

### ***Why are rodenticides essential?***

Rodenticides are a cost-effective and efficient way to control rodents that endanger public health, property, the economy, and the environment. Of the rodenticides currently approved for use by EPA, all but one have been on the market for 10 years or more and have outstanding records of minimal negative impact on public health and the environment.



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Rodenticides are used to maintain or restore the balance in natural ecosystems on islands throughout the world, where introduced rodents exist without natural enemies and feed on eggs and young of ground-nesting, native birds known for their tame behavior. Rodenticides have been used successfully on islands around the world to eliminate non-native rodents. These rodents have exterminated bird species on 26 islands and even some native rodent species, and reduced populations of the giant tortoise and the dark-rumped petrel.

***Can rodenticides be used in an Integrated Pest Management (IPM) program?***

Rodenticides are an essential component of IPM programs in public buildings. Schools are especially vulnerable to rodents due to the quantity of discarded food and messy eating habits. The behavior of children favors the spread of rodent-transmitted disease, characterized by playing close to the ground, placing hands in mouth, close contact and sharing with others, and poorer hygiene. Children whose immune systems are still developing also tend to be more vulnerable. Promoted by the public's concern and public and private research, IPM programs monitor, wait for thresholds, and choose the best ongoing program approach. IPM programs use a combination of sanitation, structural repair, mechanical traps, and/or pesticide controls which minimize impacts on human health and the environment.

***There have been stories in the news lately about the RSW and bittering agents for rodenticides. What is the RSW and how was it involved in the decision to drop the dye and bittering agent requirement?***

In late 1998, EPA issued for comment a RED covering a rodenticide "cluster." The cluster included all rodenticides considered for reregistration except zinc phosphide, which had a separate RED. The RED contained requirements to add a dye and bittering agent to certain rodenticides, and initiated a multi-phase process for consideration of methods to evaluate and address the possible exposure of children to rodenticides. EPA's Pesticide Program Dialogue Committee (PPDC) implemented this process by establishing EPA's RSW. RSW members of the stakeholder group were solicited through the *Federal Register* notice that issued the REDs, published on September 11, 1998, available at <http://www.epa.gov/EPA-PEST/1998/September/Day-11/p24337.htm>. EPA sought and obtained diverse representation on the RSW, which was composed of state, NGO, and other representatives. The RSW held numerous meetings in 1999 to develop advice and recommendations to provide to EPA, and ultimately, among other recommendations, recommended rescission of the dye and bittering agent requirements. The RSW had over 25 members, including representatives from the following:



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- EPA -- Office of Pesticide Programs
- Maryland Public Interest Research Group (MaryPIRG)
- Women Like Us
- U.S. Consumer Product Safety Commission, Division of Health Sciences
- Navajo Nation
- PM Resources, Inc.
- City of Chicago Department of Streets and Sanitation, Bureau of Rodent Control
- Pest Management Regulatory Agency, Health Canada
- Consumer Federation of America
- District of Columbia Department of Health
- Liphatech, Inc.
- State FIFRA Issues, Research and Evaluation Group (SFIREG)
- United States Department of Agriculture -- Cooperative State Research, Education and Extension Service
- Chemical Specialties Manufacturers Association
- California Department of Food and Agriculture
- Reckitt & Colman, Inc. (now Reckitt Benckiser)
- National Pest Control Association (also representing the PPDC)
- United States Department of Health & Human Services -- CDC
- Bell Laboratories



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- American Association of Poison Control Centers
- Children's National Medical Center
- Association of Structural Pest Control Regulatory Officials (ASPCRO)

The membership list is available at <http://www.epa.gov/pesticides/ppdc/rodent/members.htm>.

***What did the RSW learn when it investigated the data available regarding the possible exposure of children to rodenticides?***

The RRTF presented information at several RSW meetings, including the June 9-10, 1999, meetings, regarding the toxicity, exposure, and risk of rodenticides; those materials are available at <http://www.lawbc.com/rrtf/RRTFMaterialsfortheRSWII.pdf>. Rodenticides are specifically formulated to be relatively safe to humans while maintaining their effectiveness against reducing the rodent population and the associated risk from rodent exposure. These products have a significant margin of safety with respect to acute exposure. The amount of active ingredient present in the bait products is low enough that ingestion of many pellets is of no clinical significance.

After several well-attended public meetings and careful consideration of the information presented, the RSW issued a report in November 2000 detailing its advice and recommendations (referred to as the "RSW Report"). The RSW Report is available at <http://www.lawbc.com/rrtf/RSWFINALREPORT.pdf>. The RSW found that "[t]he vast majority of exposure cases (97%) do not result in significant health symptoms in the exposed child." The RSW also included the following findings in the RSW Report:

Rodent infestations can cause serious public health problems and serious damage to buildings and food supplies. That rodenticides are important to the control of rodents must be kept in mind when considering options for mitigating the risks posed by rodenticides.

Anticoagulant rodenticides are efficacious means to control rats and mice in the home when used as directed on the label.

The RSW made several recommendations aimed at addressing the number of calls to Poison Control Centers regarding possible rodenticide exposures. Those recommendations included rescinding the dye and bittering agent requirements included in the RED and simplifying the labels of consumer rodenticides to ensure that homeowners understand better



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how to keep rodenticide placements out of the reach of children. The PPDC on Wednesday, November 29, 2000, voted to encourage EPA to “consider as advice” the RSW Report.

### ***Why did the RSW recommend dropping the bittering agent and dye requirements?***

In the RSW Report, the RSW recommended eliminating the requirement that rodenticides incorporate an indicator dye, and noted that any registrant may explore this formulation option voluntarily. The RRTF supported the RSW’s recommendation. This requirement presented several concerns, the primary issue being failure to find a suitable chemical substance.

Other technical concerns with this requirement -- even if a suitable dye were found -- included the following:

- Distinguishing colorful stains on the hands and mouth of a child from stains that could come from food products;
- Finding an indicator dye stain that produced a stain for an appropriate diagnostic period but was not too long-lived (*i.e.*, the material did not stain a child permanently or semi-permanently); and
- Contending with the inevitable property damage that would result from contacted surfaces, such as floors, carpets, and other household areas, when a rodent translocates, or a child or pet inadvertently disturbs, the bait.

As noted in the RSW Report, RSW members also were concerned that there are no existing methods or standards for evaluating whether or not a given dye would serve as an adequate marker. Further, a dye might actually cause the rodenticides to be less efficacious, thus resulting in a reduction in rodent control. *See also* PPDC Transcript at 92-93, available at [http://www.epa.gov/oppfead1/cb/ppdc/11-00\\_transcript.pdf](http://www.epa.gov/oppfead1/cb/ppdc/11-00_transcript.pdf). EPA began implementing this recommendation with a November 2001 *Federal Register* notice, which is available at <http://www.epa.gov/EPA-PEST/2001/November/Day-28/p29557.htm>.

The RSW recommended eliminating the bittering agent as a mandatory requirement, although registrants may have the option of incorporating a bittering agent voluntarily. The RRTF supported the RSW’s recommendation. This requirement presented several concerns, the primary issue being whether making a bittering agent mandatory in all rodenticides would actually reduce the number of calls to Poison Control Centers.



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The technical concerns with requiring a bittering agent in all consumer products include the following:

- The efficacy of an agent like denatonium benzoate in causing human taste aversion is formulation-specific. There can be no one rate or proposal for bittering agents that would work in all manufacturers' products.
- The amount of denatonium benzoate in a particular formulation that causes human taste aversion may be close to the level that also causes rodent aversion. For rodenticidal baits, maintaining acceptability is paramount so the determination of an appropriate rate of bittering agent may be technically difficult.

The RRTF is not aware of any data developed to date supporting the conclusion that the addition of a bittering agent to products results in fewer incidents or calls to Poison Control Centers. Thus, the RRTF concurred in EPA's determination, as implemented through the November 2001 *Federal Register* notice, that the decision of whether to add a bittering agent to a rodenticide product should be up to each manufacturer and should not be federally mandated. *See also* PPDC Transcript at 92-93, available at [http://www.epa.gov/oppfead1/cb/ppdc/11-00\\_transcript.pdf](http://www.epa.gov/oppfead1/cb/ppdc/11-00_transcript.pdf).

### ***Why did the RSW recommend simplified consumer labels?***

The RSW concluded after its June 1999 meeting that labels for rodenticide bait products marketed to consumers should be "simplified" to help ensure that rodenticides are "used as directed on the label." Conforming labels on consumer rodenticide products to meet the goals of the Consumer Labeling Initiative (CLI) creates a more consumer-friendly label that emphasizes the need to keep the products away from children. This recommendation was endorsed by the PPDC, the RSW's "parent" organization, in 1999, *see* <http://www.epa.gov/oppfead1/cb/ppdc/july99-transcript.htm>, and the RSW concluded in its report that the PPDC should advise EPA to "[c]ontinue implementing the previously PPDC-endorsed recommendation to improve rodenticide label language and clarity, while retaining the label's enforceability." The RRTF has worked with EPA since then to discuss what these simplified labels should include.

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***There also have been press reports that EPA is preparing an “ecological risk assessment” of rodenticides. Didn’t the RED already come out? Is the RRTF involved in that process?***

Unlike other pesticides where EPA prepared its risk assessments prior to the issuance of the RED, EPA did not do so here. Rather, EPA’s work on its assessment of rodenticides was ongoing after the RED’s issuance, and EPA held an initial public meeting on this issue on October 19, 1999, as noticed in the *Federal Register* at <http://www.epa.gov/EPA-PEST/1999/October/Day-08/p26324.htm>.

***Was the RRTF involved in the October 1999 meeting?***

Yes. As noted on the agenda for the October 19, 1999, meeting entitled “Rodenticide Risks to Birds and Non-Target Mammals,” the RRTF was provided a half-hour time slot to make a presentation. EPA and representatives of the states of New York and California were provided an hour and forty-five minutes, and the American Bird Conservancy (ABC) was given a half-hour time slot. See <http://www.epa.gov/pesticides/ppdc/rodent/oct19agenda.htm>. The RRTF thereafter provided written comments on the meeting, which are available at <http://www.lawbc.com/rrtf/Comments.pdf>.

***Has EPA issued an ecological risk assessment for rodenticides?***

EPA has not prepared or issued any ecological risk assessment of rodenticides. As discussed below, EPA has issued for public comment -- but not in final form -- a preliminary comparative assessment entitled “Potential Risks of Nine Rodenticides to Birds and Nontarget Mammals: A Comparative Approach” (assessment), however. This assessment, however, is not an ecological risk assessment.

***Has EPA’s assessment been issued for public comment?***

After the October 1999 meeting, EPA determined that its draft rodenticide assessment should be considered under the multi-phase public participation tolerance reassessment process for risk assessments described in its March 15, 2000, *Federal Register* notice. Under that process, the following steps are followed.

- Phase 1 -- A copy of a “risk assessment” is provided to registrants for error-only review, and registrants review and comment on assessment.

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- Phase 2 -- EPA reviews and corrects (as it deems necessary) assessment.
- Phase 3 -- EPA publishes a *Federal Register* Notice of Availability releasing the “preliminary risk assessment” for public comment. The assessment is published on EPA’s website.
- Phase 4 -- EPA considers comments, develops a “revised risk assessment.”
- Phase 5 -- EPA publishes Notice of Availability of the revised risk assessment and solicits risk management ideas.
- Phase 6 -- EPA develops risk management strategies.

See <http://www.epa.gov/fedrgstr/EPA-PEST/2000/March/Day-15/p6398.htm>.

***At what stage in the process is the rodenticide assessment?***

The rodenticide assessment is currently in Phase 4, with Phase 5 coming next. EPA issued the assessment for public comment on January 29, 2003, and the comment period closed on May 30, 2003. See <http://www.epa.gov/EPA-PEST/2003/January/Day-29/p2021.htm>; <http://www.epa.gov/EPA-PEST/2003/April/Day-23/p10070.htm>. The e-docket for this assessment, including the RRTF’s comments, is available at [http://cascade.epa.gov/RightSite/dk\\_public\\_collection\\_detail.htm?ObjectType=dk\\_docket\\_collection&cid=OPP-2002-0049&ShowList=items&Action=view](http://cascade.epa.gov/RightSite/dk_public_collection_detail.htm?ObjectType=dk_docket_collection&cid=OPP-2002-0049&ShowList=items&Action=view).

***It seems unusual that the rodenticide “assessment” has been inserted in the multi-phase process when the RED has already been issued, particularly if it is not an ecological risk assessment, since the multi-phase process is for risk assessments.***

The RRTF agrees that EPA’s decision is unusual. Because the RRTF disagrees that the assessment is a risk assessment, the RRTF has asserted to EPA that it should not be part of the multi-phase process. EPA’s decision to use the multi-phase process for this assessment is consistent with EPA’s stated goal of transparency for its reregistration process, however. While EPA could have handled the assessment outside of the public participation process and therefore denied all stakeholders the opportunity to comment, it instead chose to subject its decision-making to the scrutiny of all stakeholders, including NGOs as well as registrants.



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***What types of errors were in the assessment issued for Phase 1 error-only comment to the registrants?***

EPA prepared a “comparative assessment” of nine rodenticides rather than an ecological risk assessment. The most striking error noted by the RRTF in its comments is that EPA’s initial document ranked the relative hazard of the different active ingredients, but did not estimate exposure, without which risk cannot be estimated. As such, it was actually a hazard ranking based on the relative toxicity of each rodenticide, and could not be characterized as a risk assessment or used for the same purposes as a risk assessment. Further comments from the RRTF are available in EPA’s response to comments in the e-docket.

***Was the assessment EPA issued for public comment in January 2003 an ecological “risk assessment”?***

It was not, and EPA has implicitly acknowledged that it was not. The term “ecological risk assessment” is not used in the assessment, and it is entitled “Potential Risks of Nine Rodenticides to Birds and Nontarget Mammals: a Comparative Approach,” with no reference to “ecological risk.” The term “ecological risk” appears only once in the assessment (other than as part of the name of a database or document) on page 8, where it states: “Exposure is an integral component of ecological risk, and there are important exposure questions for these rodenticides.” See [http://cascade.epa.gov/RightSite/getcontent/Tempfile.pdf?DMW\\_OBJECTID=090007d4800fb490&DMW\\_FORMAT=pdf](http://cascade.epa.gov/RightSite/getcontent/Tempfile.pdf?DMW_OBJECTID=090007d4800fb490&DMW_FORMAT=pdf). Indeed, the word “ecological” also appears only once, in the very same sentence.

***Why is it not an ecological risk assessment?***

An “ecological risk assessment” requires a process that evaluates the likelihood that adverse ecological effects may occur or are occurring because of exposure; more information about this process is available at [http://oaspub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=36512](http://oaspub.epa.gov/eims/eimscomm.getfile?p_download_id=36512) and <http://www.epa.gov/pesticides/ecosystem/ecorisk.htm> (“What is An Ecological Risk Assessment? In an ecological risk assessment, we evaluate the likelihood that exposure to one or more pesticides may cause harmful ecological effects.”). The preliminary assessment does not “evaluate the likelihood” of adverse ecological effects occurring because of exposure, and simply compares and ranks the hazard (the relative toxicity) of each of the nine rodenticides. It does not evaluate the likelihood that, based on use patterns, a non-target (such as a bird or other wildlife that is not listed as a target on the label) will be exposed to (and experience adverse effects from) a rodenticide. Accordingly, EPA’s preliminary comparative assessment is not an ecological risk assessment.

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***The next phase in the multi-phase process is Phase 5, where EPA publishes a Notice of Availability of the revised risk assessment and solicits risk management ideas. If the assessment is not an “ecological risk assessment,” how can it be used to identify appropriate and responsive risk management strategies?***

The RRTF believes that this is a very important question. EPA cannot use this assessment for the purposes of a scientifically defensible ecological risk assessment when it is only, at best, a hazard-ranking scheme. It thus cannot be used as a basis for the solicitation of risk management ideas or for making risk management decisions.

***The Information Quality Act requires that information disseminated by EPA must be supported by sound science, and certain documents -- including risk assessments -- must be peer reviewed. Wouldn't an appropriate peer review conducted in accordance with EPA's Peer Review Handbook have addressed and corrected these issues and, in particular, ensured that a document being issued as a “risk assessment” actually is a “risk assessment”?***

The RRTF strongly believes that EPA's assessment fails to meet the standards set by the Information Quality Act, and that EPA's “peer” review of the assessment failed to comply with its Peer Review Handbook, as outlined in the RRTF's comments.

***Stories in the press have suggested that registrants had “undue influence” in both the elimination of the dye and bittering agent rescission and the risks to wildlife issue. Is this true?***

The RRTF strongly contests any suggestion that it had “undue influence” over the content or process of either of these issues. As noted in the discussion above regarding the RSW, the elimination of the dye and bittering agent requirement was done at the request of a diverse group of stakeholders -- the RSW -- which included NGOs such as MaryPIRG and Women Like Us. A *Federal Register* notice was issued soliciting members, and any stakeholders could have sought membership. The RRTF was not a member of the RSW. There were five RSW meetings, all of which were open to the public, and two public PPDC meetings. EPA set a very open process for consideration of this issue and followed it.

Similarly, EPA has determined it will follow its six-phase public participation process for the rodenticide assessment, and is doing so despite the RRTF's protests that it is inappropriate for EPA to do so, particularly since this is a unique situation where the RED has already been issued. EPA has sought transparency in its decision-making for this issue, starting with its initial October 1999 meeting (also noticed in the *Federal Register*), and stakeholders have had an opportunity to comment during the phases reserved for public comment. Indeed, the



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RRTF's comments on the assessment distributed for public comment were highly critical, hardly indicative of an entity that is exerting "undue influence."

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We hope the preceding is helpful and would welcome any questions or comments on the foregoing. Please send an e-mail to Lynn L. Bergeson at [lbergeson@lawbc.com](mailto:lbergeson@lawbc.com) with any questions.