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Governor



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# Arizona Department of Agriculture

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July 9, 2009

Debbie Edwards  
Director, Office of Pesticide Programs  
U.S. EPA  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Ms. Edwards:

By means of this letter, the State FIFRA Issues Research and Evaluation Group (SFIREG) hereby petitions the U.S. Environmental Protection Agency to classify all strychnine-containing rodenticides as Restricted Use Pesticides (RUPs). Please allow me to provide some rationale for this position.

There are many strychnine-containing rodenticides registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) for the control of pocket gophers. The labeling for these products restricts use to sub-surface applications in pocket gopher burrows.

Many states are observing continued misuse of strychnine rodenticides for the control of black-tailed prairie dogs and other pests not found on the product labeling. Furthermore, since prairie dogs feed on above-ground vegetation, use of strychnine products for prairie dog control almost always involves broadcast applications of bait products on the soil surface. This dramatically increases the chances that strychnine products will be ingested by non-target species. There is also a risk of secondary poisoning of raptors and other predators that feed on poisoned prairie dogs.

While many strychnine rodenticides are classified as RUPs, many products sold in small packages are not. Because there are no record-keeping requirements for the distribution, sale, and use of unclassified pesticides, it is difficult for state pesticide regulators to investigate cases involving the misuse of unclassified strychnine products.

Therefore, SFIREG respectfully petitions EPA to classify all strychnine-containing rodenticides as RUPs. This will provide tighter controls over the distribution, sale, and use of these products. It will also implement record-keeping requirements throughout the supply chain, making it easier for pesticide regulators to investigate when misuse occurs. Last, it is obvious that strychnine can be highly toxic to some species, and restricting use to certified applicators should better mitigate risk to the environment.

I thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Peterson".

Jack Peterson  
Associate Director, ESD and SFIREG Chair