

# UNIVERSITY OF HAWAII AT MĀNOA

College of Tropical Agriculture and Human Resources  
Department of Plant and Environmental Protection Sciences

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Kelly Sherman  
Special Review and Reregistration Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2006-0955**  
*Comments in Response to Rodenticides; Proposed Risk Mitigation Decision; Extension of Comment Period. Federal Register Vol. 72, No. 49, pp. 11871-11872.*

The following comments are being submitted in response to the March 14, 2007 *Federal Register* notice regarding EPA's Proposed Risk Mitigation Decision for nine rodenticides. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of rodenticides in the livestock industry in Hawai'i.

Mice and rats are significant pests on livestock farms, causing feed losses, damaging structures, and spreading disease. EPA has addressed impacts on households and food establishments, but has not addressed impacts on agriculture, and livestock production in particular. On livestock farms, rodenticides are used in and around buildings where livestock are housed and where feed is stored. Rats may also infest some waste handling areas.

On livestock farms, feeds that are attractive to rodents are readily available, making bait placement and attractiveness very important for control. Having sealed packets of bait that can be placed directly into walls, pipes or burrows can improve control. For many applications, however, tamper-resistant bait stations would provide reasonable control.

One respondent indicated that application of rodenticides by a certified applicator is the least desirable option. Hawai'i's pig production consists of a large number of small operations; it is unrealistic for many of them to become certified pesticide applicators. Use of third party applicators (if they are affordable) that are well-trained in and/or not carefully observant of biosecurity measures could easily transmit disease from farm to farm and even to the general community.

Input for these comments was provided by Extension personnel of the College of Tropical Agriculture and Human Resources

Comments submitted by:



Mike Kawate  
Pesticide Registration Specialist  
Voice: 808-956-6008  
mike@hpirs.stjohn.hawaii.edu



Cathy Tarutani  
Educational Specialist  
Voice: 808-956-2004  
cathy@hpirs.stjohn.hawaii.edu

3050 Maile Way, Gilmore Hall 310, Honolulu, Hawaii 96822

Telephone: (808) 956-7076, Facsimile: (808) 956-2428, E-mail: [peps@ctahr.hawaii.edu](mailto:peps@ctahr.hawaii.edu), Web: [www2.ctahr.hawaii.edu](http://www2.ctahr.hawaii.edu)

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