

15 November 2017

Helen Black

Via: fyi-request-6561-2924a830@requests.fyi.org.nz

Dear Mrs Black

Official Information Act Request

I refer to your request for information received on 17 October 2017 regarding brodifacoum, specifically the product Pestoff Rodent Bait 20R. Your request has been treated as a request for information under the Official Information Act 1982. Our response to your request is below.

The product Pestoff Rodent Bait 20R contains the active ingredient brodifacoum at a concentration of 0.02 grams per kilogram (0.002%). Pestoff Rodent Bait 20R was transferred into the Hazardous Substances and New Organisms Act 1996, after first being approved under the Pesticide Act 1979. The environmental and human health effects were assessed, and hazard classifications and appropriate controls were applied to ensure that the effects are minimised and mitigated.

When a product is assessed, available studies regarding the active ingredient are used to determine hazard classifications and appropriate controls. The studies below were used to assess the aquatic ecotoxicity of the active ingredient brodifacoum.

- Hill, R. (1979) Determination of the Acute Toxicity of PP 581 to Rainbow Trout. BL/B/1877 (Unpublished study received Feb 27, 1979 under 10182-26; prepared by Imperial Chemical Industries, Ltd., Eng., submitted by ICI Americas, Inc., Wilmington, DE; CDL:237703-C).
- Getty, C.; Wilkinson, W.; Sealey, C. (1978) Brodifacoum: Toxicity of the Liquid Concentrate Pelleted Bait and Technical Material to First Instar Daphnia magna: Report Series RJ0046B. (Unpublished study received Mar 29, 1974 under 10182-26; prepared by Imperial Chemical Industries Ltd., Eng., submitted by ICI Americas, Inc., Wilmington, DE; CDL:237909-A).

The study below was used to apply the hazard classification 6.1A to the active ingredient brodifacoum regarding the inhalation of dust.

- Parr-Dobrzanski, R. (1993) Brodifacoum: 4-Hour Acute Inhalation Toxicity Study in the Rat: Lab Project Number: CTL/P/4065. Unpublished study prepared by Zeneca Central Toxicology Lab. 139 p.

Pestoff Rodent Bait 20R does not meet the classification criteria for this hazard due to the low concentration of the active ingredient in the product. Noting the low concentration of brodifacoum in the product, bystanders of aerial applications are not at risk as the amount of brodifacoum in the air will be extremely low, if present at all.

If you have any queries please do not hesitate to contact Frances Charlett-Green on frances.charlett-green@epa.govt.nz or 04 474 5533.

Yours sincerely



Dr Fiona Thomson-Carter
General Manager
Hazardous Substances and New Organisms