



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Conditional Registration of Safrotin

TO: William H. Miller  
Product Manager (16)  
Registration Division (TS-767C)

FROM: R.S. VanDenburgh, Entomologist  
IRB-TSS

*R.S. VanDenburgh 2-4-81*

Flea control has become an increasing difficult pest control problem in the last few years. Consequently fleas are now one of the most important household pests. It should be noted that in addition to causing discomfort and annoyance, fleas can be important public health pests since certain fleas have the capability of transmitting pathogenic organisms. The number of residual insecticides presently registered for flea control is limited. There have been reports of control failures in certain areas, some of which are probably due to resistance. Laboratory and field test data for flea control submitted by Sandoz, Inc., and reviewed by IRB-TSS have demonstrated that Safrotin is a highly effective insecticide for flea control.

Several letters of public comment on the proposed registration of Safrotin have been submitted.

Of a total of 12 letters from pest control operators, 11 indicated a need for a new flea control insecticide. Six of these letters specifically indicated a need for Safrotin.

The National Pest Control Association, which represents over 2500 pest control firms, indicated that a pesticide with the effectiveness of Safrotin is needed for flea control.

The University of Nebraska indicated that while they could control fleas with certain registered insecticides, they encouraged registration of additional flea control products.

The University of California, Riverside, indicated that Safrotin had performed well in their evaluations and that use of Safrotin in California would result in improved flea control.

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The Texas Agricultural Extension Service (Texas A&M University) stated that there is a need for a product such as Safrotin for flea control.

Dr. C.G. Wright of North Carolina State University indicated that few insecticides give good effective flea control and that the commercial pest control industry needs help in this area of pest control.

Dr. Austin Frishman of the State University of New York stated that he has documented reports of trouble in effectively controlling fleas in nine(9) states.

The California Dept. of Health Services did not feel that Safrotin was needed for flea control. It should be noted that this opinion conflicts with that of the University of California, Riverside.

The State of Hawaii Dept. of Health indicated that there was no need for additional restricted flea insecticides but that here was a need for more general use flea insecticides.

The State of Florida Dept. of Health and Rehabilitative Services indicated that fleas have become one of the most difficult household pest problems for commercial pest control operators and that registered products either do not provide adequate residual activity or flea populations are resistant. The letter states "A product such as Safrotin is desperately needed in Florida".

The New Orleans Dept. of Health and Human Resources (Office of Health Services) indicated that additional pesticides effective against fleas are a major need, particularly since fleas on rats have been responsible for transmission of murine typhus in north Louisiana in 1979. At that time approved pesticides did not control fleas and DDT wettable powder had to be used under crisis exemption. In the New Orleans area in 1979 it was found that repeat applications of approved pesticides were very slow in controlling flea populations. The letter states "We are frankly frustrated in our inability to quickly resolve this potential hazardous situation because of the relatively ineffective pesticides approved for this use". With reference to the increasing flea problem in Louisiana homes, the letter states "The availability of an effective approved pesticide for indoor flea control in the armamentarium of the Commercial Pest Control Operator would be a major advance."

Based on the Safrotin flea control data submitted to the Agency for registration by Sandoz, Inc. and on our general understanding of the present flea control problem, the opinion of IRB-TSS is that conditional registration of Safrotin would be in the public interest. This opinion is supported by most of the letters of public comment on the proposed registration of Safrotin.