UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR

In the Matter of: Reckitt Benckiser LLC, et al. EPA Reg. Nos. 3282-3, 3282-4, 3282-9, 3282-15, 3282-66, 3282-74, 3282-81, 3282-85, 3282-86, 3282-87, and 3282-88; Application Nos. 3282-RNU and 3282-RNL	FIFRA Docket No. 661

PETITIONER'S REPORT OF PREHEARING EXCHANGE

Reckitt Benckiser LLC ("Petitioner") hereby respectfully submits, in accordance with the Court's Prehearing Order dated February 10, 2014, its prehearing exchange of primary discovery materials.

1. Witnesses and Expected Testimony

Petitioner's witnesses list and brief narrative summary of their expected testimony is attached.

2. Exhibits

A list of all documentary and physical exhibits that at this time Petitioner intends to introduce also is attached. In accordance with the February 25, 2014 Order on Joint Motion Concerning the Prehearing Exchange, electronic copies of all paper exhibits, and photographs of physical exhibits, have been downloaded onto flash drives that are being provided to all parties.

Petitioner reserves the right to supplement the list of exhibits upon adequate notice to the other parties.

3. Official Notice

At this time, Petitioner is unaware of any matters of which official notice should be taken. Petitioner reserves the right to move for official notice of matters as may be appropriate.

4. Location and Duration of the Direct Case, and Translation Services

For the reasons set forth in Respondent's Report of Prehearing Exchange (dated February 28, 2014), Petitioner agrees that it is appropriate to hold the evidentiary hearing in the Washington, D.C. metropolitan area.

Petitioner estimates that it can present its direct case in 81 hours if all witnesses present their direct testimony orally. If Petitioner is permitted to submit written direct testimony for many of its witnesses (which is Petitioner's preference), Petitioner estimates that it can present its direct case in 50 hours.

No translation services will be required for any of Petitioner's witnesses.

5. Submission of Questions to the NAS

Petitioner believes that there are questions of scientific fact associated with this proceeding that must be presented to a committee of the National Academy of Sciences. In accordance with 40 C.F.R. § 164.50(e)(2), Petitioner will be prepared to file and serve proposed questions of scientific fact, accompanied by reasons supporting their submission, within the time frame established by the Administrative Law Judge for such filing and service.

Respectfully submitted,

Dated: 3.14.14

By: _____

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Witness List and Brief Narrative Summaries of Testimony

1. **Dr. Ahna Brutlag**, DVM, MS, DABT, DABVT, Associate Director of Veterinary Services, Pet Poison Helpline and SafetyCall International, PLLC. Dr. Brutlag is a veterinarian specializing in clinical toxicology for companion animals. She is board-certified in both toxicology and veterinary toxicology, and she has significant experience with pet poisoning management and rodenticide toxicosis.

   Dr. Brutlag is expected to testify regarding the following matters: the potential impacts of EPA's NOIC on domestic animals, including the results of a survey of veterinarians; the cost and complexity of treating pets exposed to different rodenticides; the limitations of various pet incident data sources and EPA's analysis of pet incident data; the relative risks of anticoagulant rodenticides and non-anticoagulant rodenticide products to cats and dogs; and trends in bromethalin rodenticide exposures reflected in calls to the Pet Poison Helpline. Dr. Brutlag will provide both fact and expert testimony.

2. **Dr. Peter Chyka**, Pharm.D., Professor of Clinical Pharmacy and Executive Associate Dean at the University of Tennessee Health Science Center, College of Pharmacy, in Knoxville, Tennessee. Dr. Chyka is board-certified in clinical toxicology and has significant experience in clinical toxicology and poisoning management.

   Dr. Chyka is expected to testify regarding the risks (or lack thereof) to young children of consumer-use anticoagulant rodenticide products in the typical exposure scenario. He also is expected to testify regarding his participation on the expert panel that researched and wrote the guideline that poison control centers use when responding to calls concerning potential SGAR exposures. Finally, Dr. Chyka is expected to testify regarding the limitations of using only aggregate American Association of Poison Control Centers (AAPCC) data to make conclusions about risk. Dr. Chyka will provide both fact and expert testimony.

3. **Steven Hall**, M.S.E., C.P.S.M., Senior Consultant and Director of Hazard Communication Consultations, Applied Safety & Ergonomics, Inc., Ann Arbor, Michigan. Mr. Hall has significant experience in human factors/ergonomics, the development of warnings and instructions, human information processing and decision making, and product and occupational safety.

   Mr. Hall will be called as an expert witness. He is expected to testify regarding the results of a label evaluation study he conducted to determine whether the revised label that Reckitt submitted to EPA is more effective at providing certain information to consumers than the original label. Mr. Hall is engaged in ongoing research, and Petitioner reserves the right to seek to supplement his report when that research is complete.

4. **Dr. James V. Hillman**, MD, FAAP, FACEP, FACMT, President of Toxicology, Environmental, and Medical Consultants, LLC in Tampa, Florida; Clinical Professor of Pediatrics, University of South Florida College of Medicine in Tampa, Florida. Dr. Hillman is a pediatrician and is board certified in general emergency medicine, pediatric

emergency medicine, and medical toxicology. He has significant clinical experience in these three areas as well.

Dr. Hillman is expected to testify regarding the risks, toxicity, and emergency department treatment of children exposed to various types of rodenticides. Dr. Hillman will provide both fact and expert testimony.

5. **Dr. Richard Kingston**, PharmD, President of Regulatory and Scientific Affairs at SafetyCall International Poison Center, and a Clinical Professor of Pharmacy at the University of Minnesota. Dr. Kingston has significant experience in the areas of clinical toxicology and pharmacology, poison control, exposure incident data, and the management of human exposure incidents involving rodenticides.

   Dr. Kingston is expected to testify regarding the potential risks to children from the actions EPA has proposed in the NOIC. He also is expected to testify regarding poison control center procedures, exposure trends, the value and limitations of AAPCC data, and the flaws in EPA's depiction and analysis of the AAPCC data. Finally, Dr. Kingston is expected to testify regarding the risks of non-anticoagulant rodenticides to vulnerable populations, including people with psychological and developmental disabilities, suicidal individuals, and the victims of malicious poisoning events. Dr. Kingston will provide both fact and expert testimony.

6. **Dr. James McCluskey**, MD, MPH, Ph.D, FACOEM, Medical Director of the Center for Environmental/Occupational Risk Analysis and Management at University of South Florida, Medical Director of Publix Supermarkets, and Assistant Professor at the USF College of Medicine in the Department of Internal Medicine and at the USF College of Public Health in the Department of Environmental and Occupational Health. Dr. McCluskey is a board-certified occupational medicine physician, toxicologist, and risk assessor. He has significant experience in toxicology, causality assessment, and occupational and environmental infections.

   Dr. McCluskey is expected to testify regarding the following matters: importance of rodenticides in rodent control and health effects of rodent interactions; typical exposure scenarios for children and adults; risks associated with anticoagulant and non-anticoagulant rodenticide products; and the NOIC's potential impacts on public health, particularly with respect to children and the underprivileged. Dr. McCluskey will provide both fact and expert testimony.

7. **Dr. Beth Mileson**, Ph.D., DABT, Senior Managing Toxicologist, Technology Sciences Group Inc., Washington, DC. Dr. Mileson is a board-certified toxicologist with significant experience in toxicology and risk assessment for pesticides, chemicals, and consumer products.

   Dr. Mileson will be called as an expert witness. She is expected to testify regarding the toxicity of various anticoagulant and non-anticoagulant rodenticides with respect to children. She also is expected to testify regarding the risk assessment she conducted for

these rodenticides. Finally, Dr. Mileson is expected to testify regarding the flaws in EPA's exposure and risk assessments for brodifacoum and bromethalin.

8. **Dr. Robert Poppenga**, DVM, Ph.D., DABVT, Professor of Clinical Veterinary Toxicology, California Animal Health and Food Safety Laboratory System, School of Veterinary Medicine, University of California at Davis, in Davis, California. Dr. Poppenga is a board-certified veterinary toxicologist with extensive experience in domestic animal toxicology, adverse effects of pesticides on animals, comparative medicine and toxicology, and analytical methodologies for chemical contaminants.

   Dr. Poppenga is expected to testify regarding the toxicity of various rodenticides and potential risks of the NOIC with respect to household animals, specifically dogs and cats. He also is expected to testify regarding the malicious use of rodenticides and the availability of diagnostic tests to detect intoxication by different rodenticides. Finally, Dr. Poppenga is expected to testify regarding the flaws and inconsistencies in EPA's approach to SGAR risk mitigation. Dr. Poppenga will provide both fact and expert testimony.

9. **Dr. Alan Peter Buckle,** Ph.D. Dr. Buckle has spent the last 40 years studying the efficacy of rodenticides for the control of rodent pests, first in the service of several departments of the government of the United Kingdom including the Ministry of Agriculture, Fisheries and Food and the Centre for Overseas Pest Research of the Overseas Development Administration, then in various roles in the chemical industry and currently in academia as Visiting Research Fellow of the University of Reading (UK).

   Dr. Buckle currently holds the following posts:
   - Chairman, Rodenticides Resistance Action Group of the UK (http://www.bpca.org.uk/pages/index.cfm?page_id=53).
   - Chairman, Campaign for Responsible Rodenticide Use UK (www.thinkwildlife.org.uk).
   - Chairman, Steering Group of the UK SGAR Stewardship Regime
   - Vice-Chairman, Rodenticides Resistance Action Committee of CropLife International (http://www.croplife.org/home)
   - Vice-Chairman, Rodenticide Working Group of the European Biocidal Products Forum (www.cefic.org).
   - Vice-Chairman, Campaign for Responsible Rodenticide Use Ireland (www.thinkwildlife.org).

   Dr. Buckle will testify about the comparative efficacy of different forms of rodenticide bait type, formulation and presentation, and the comparative efficacy of different kinds of rodent control strategies. Dr. Buckle will also testify on regulatory approaches to rodenticides in the United Kingdom, the European Community and other jurisdictions. Dr. Buckle is an expert in rodent control methods and strategies, and will provide both fact and expert testimony.

10. **Dr. Colin V. Prescott,** Ph.D. Dr. Prescott is the Director of the Vertebrate Pests Unit and Principal Research Fellow at the School of Biological Sciences at the University of Reading. Dr. Prescott is an expert in anticoagulant rodenticides, their mode of action, their biphasic elimination, their impact on primary and secondary non-target species, and the development of physiological resistance. Dr. Prescott is a member of the editorial boards of Pest Management and associate editor of Pest Management Science. He is also a member of the Rodenticide Resistance Action Group and the Campaign for Responsible Rodenticide Use.

    Dr. Prescott will testify on the comparative efficacy of different forms of bait and different active ingredients, and will testify on studies he has conducted on developing resistance factors for different active ingredients, as well as studies on the comparative efficacy of different active ingredients. Some of this research is ongoing, and Petitioner reserves the right to supplement the record with additional exhibits updating Dr. Prescott's research. Dr. Prescott will provide both fact and expert testimony.

11. **Dr. Hans Joachim Pelz,** Ph.D. Dr. Pelz was previously the head of the vertebrate section and deputy head of the Institute of Nematology and Vertebrate Research of the Julius Kühn-Institute, Federal Research Centre for Cultivated Plants in Germany. His major emphasis in scientific research has been applied rodent ecology and rodent control. For more than 20 years, his focus of research has been resistance to anticoagulant rodenticides, which he is still pursuing since his early retirement in mid 2008 through contributions to scientific journals, conferences, and consulting activities.

    Dr. Pelz will testify on the genetic basis for biological resistance to rodenticides in commensal rodents, the manifestation of genetic resistance as actual failures in rodent control, the spread of resistance to non-resistant populations, and the implications of resistance to rodent control generally and to EPA's proposed cancellation actions in particular. Dr. Pelz will provide both fact and expert testimony.

12. **Dr. Hans Michael Kohn**, Ph.D. Dr. Kohn is an Associate Professor at the Department of Ecology and Evolutionary Biology at Rice University. Dr. Kohn and his lab employ molecular and bioinformatics tools to study the evolutionary dynamics of genes and genomes in populations and species. Much of Dr. Kohn's work is concerned with the evolutionary dynamics and medical effects of mutations in the vitamin K cycle genes, foremost vkorc1, in rats and mice that have developed a resistance to anticoagulant rodenticides.

    Dr. Kohn will testify on the genetic sources of resistance in commensal rodents, the presence of genetic markers for resistance in the United States, and the potential for the spread of resistance over time, and the implications of resistance among commensal rodents for rodent control, regulation of rodenticides and the EPA's NOIC. Dr. Kohn will also testify about his survey of resistance among commensal rodents in the U.S., some of which is ongoing, and Petitioner reserves the right to supplement the record with additional exhibits updating Dr. Kohn's work. Dr. Kohn will provide both fact and expert testimony.

13. **Dr. Robin Cantor.** Dr. Robin Cantor is a Director in Berkeley Research Group's Washington, DC, office. She has a Ph.D. in economics from Duke University and has extensive experience in the areas of environmental, health, and energy economics, applied economics, statistics, and risk management. Dr. Cantor has a faculty appointment at Johns Hopkins University, is a former president of the Society for Risk Analysis, and from 2001 to 2003 served as an appointed member of the Research Strategies Advisory Committee of the U.S. Environmental Protection Agency's Science Advisory Board. Dr. Cantor will be called as an expert witness. She is expected to testify on the economic impacts of the proposed cancellation on consumers and small businesses as a result of the incremental costs of conforming rodenticide products. She will also testify on the potential economic impact of countervailing risks associated with reduced efficacy of conforming products and consequent increases in the incidence of residential rodent infestations. In addition, she will testify on economic impacts to low-income and minority rodenticide users.

14. **Dr. Brad Gessner.** Dr. Gessner is a pediatrician and medical epidemiologist, with 22 years experience in public health. He has served as the Scientific Director for Agence de Médecine Preventive, a French Agency that performs immunization-related public health globally; supervised for several years asthma surveillance in Alaska; and has conducted numerous studies on human health effects of various toxins. He is the author of over 140 peer-reviewed manuscripts and dozens of technical documents, has presented at scientific congresses globally, and sits on numerous scientific committees in the field of infectious diseases.

    Dr. Gessner will be called as an expert witness. His testimony is expected to address the prevalence of rodent-associated and rodent-borne diseases, including asthma, rodent bites, and infectious diseases. He is also expected to describe the extent and cost of health care utilization associated with these diseases.

15. **Dr. Carolyn Meyer.** Dr. Meyer has 26 years of experience as a biologist and ecologist. She worked for the U.S. Fish and Wildlife Service and National Park Service for 10 years, the Swiss Federal Institute for Water Resources and Pollution Control for 1 year, University of Wyoming for 7 years as an adjunct professor, and as a consultant for the last 8 years. At ARCADIS, she currently is the discipline lead in population biology and modeling and teaches short courses at conferences on applications of population biology to ecological risk assessments.

    Dr. Meyer will be called as an expert witness. She is expected to testify on the projected increase in house mouse and Norway rat populations in the event that EPA's proposed cancellation and denial actions go forward. This testimony will include Dr. Meyer's ongoing research on the projected increase in the number and duration of commensal rodent infestations in a range of scenarios, including single-family and multi-family homes. Some of Dr. Meyer's work is ongoing, and Petitioner reserves the right to supplement the record with additional exhibits describing Dr. Meyer's ongoing research and studies in this area.

16. **Dr. Anne Fairbrother.** Dr. Fairbrother is a veterinarian and Ph.D. ecotoxicologist with more than 30 years of experience in ecotoxicology, wildlife toxicology, contaminated site assessment, and regulatory science for existing and emerging chemicals in the United States, Canada, and Europe. She spent 13 years as a research scientist at EPA, during which time she wrote Agency guidance for ecological risk assessments and developed protocols and scientific support for the Agency's pesticide review process. She has published over 100 peer-reviewed articles and book chapters and have served on numerous scientific committees, expert panels, and editorial boards, including EPA's scientific advisory panels for endocrine disruptors and pesticide testing guidelines, committees for the National Academy of Sciences, and European Research Council review panels.

Dr. Fairbrother will be called as an expert witness. She is expected to testify on the risk of non-target wildlife exposure to rodenticides, including second-generation anticoagulant rodenticides. This will include a discussion of the Agency's risk model for rodenticides, rodenticide-related wildlife incidents recorded to date, the toxicology of rodenticides, rodent biology and behavior as it relates to exposure of non-target wildlife, and the relative contribution of consumers, pest control professionals, and agriculture users to non-target wildlife exposures to rodenticides.

17. **Dr. Richard Stroud.** Dr. Stroud served as a diagnostic and forensic wildlife veterinary pathologist for over 27 years for the US Fish and Wildlife Service, and for three years as coordinator of toxicological investigations, including pesticide use, for Region 1 of the USFWS. He has examined over 10,000 carcasses of various species of wildlife for cause of death. He is the author of over 30 publications related to veterinary pathology.

Dr. Stroud will be called as an expert witness. He is expected to testify as to the appropriate methods for examining wildlife carcasses and accurately evaluating the cause of death, including the difficulties of examining wildlife carcasses from the field due to the effects of autolytic change, scavenger and predator damage, and the general lack of field investigation for all possible causes of death. He is also expected to testify as to the likelihood that brodifacoum was a causal or contributing factor in wildlife incidents reported by various state agencies.

18. **Steve McGonegal.** Mr. McGonegal has more than 25 years of experience directing and conducting projects that involve economic and statistical research, analysis, surveys, and database construction. He has published and presented testimony and other expert analyses on issues relating to the digital economy and Internet use, telecommunications, health care, electricity, environmental regulation, and health and safety associated with consumer products, workplace hazards, food, drugs, medical devices, and pesticides.

Mr. McGonegal will be called as a fact and expert witness. He is expected to testify as to the availability to consumers of bulk rodenticides through online sales channels and brick-and-mortar establishments. He also may testify regarding his analysis of emergency department visits and hospital admissions associated with household chemicals and rodenticides.

19. **Larry Brewer.** Mr. Brewer has been professionally involved in the wildlife and ecotoxicology fields for 28 years. After serving 15 years as a research biologist for the Washington Department of Wildlife, he helped develop the Institute of Wildlife Toxicology at Western Washington University, where he became leader of the Field Research Section. He also was also a member of a team that established the Institute of Wildlife and Environmental Toxicology at Clemson University, where he was a faculty member and Leader of the Ecotoxicology Research Section. Mr. Brewer presently serves as Director of the Avian and Wildlife Toxicology Department at Smithers Viscient Carolina Research Center.

Mr. Brewer will be called as a fact witness. He is expected to testify as to the methodology and implementation of a study of the variation in the relative prevalence of brodifacoum, bromadiolone, and bromethalin in small mammals by urban land use. He may also testify as to the methodology and implementation of studies assessing the efficacy of rodenticide products using bait stations, the level of food and water consumption of house mice exposed to rodenticides, and the methods used to gather rodent samples to support a survey of genetic resistance to anticoagulant rodenticides in the U.S.

20. **Edwin F. (Rick) Tinsworth.** Mr. Tinsworth is a Principal in Exponent's Health Sciences Center for Chemical Regulation and Food Safety. Mr. Tinsworth has more than 45 years of government and private sector experience in regulatory and scientific management in the areas of food safety, chemical regulation, pesticides and consumer products. His experience includes six years at EPA, including as Director of the Special Review and Reregistration Division and Director of the Registration Division in the Office of Pesticide Programs. Mr. Tinsworth is an expert in new product approval and product support, with an emphasis on pesticide products including conventional chemicals, and microbial, biochemical and biotechnology products. Mr. Tinsworth is also an expert in the use of scientific data, risk and benefit assessments, and risk mitigation analyses to comply with state and federal regulations.

Mr. Tinsworth will testify on risks and benefits of the products subject to cancellation compared to the products remaining on the market. His testimony may include discussion of data he has developed identifying the registration status of rodenticide products during the period of EPA's regulatory actions on rodenticides. Mr. Tinsworth will testify as a fact and as an expert witness.

21. **Dr. W. Ian Lipkin.** Dr. Lipkin, MD, is internationally recognized as an authority on the use of molecular methods for pathogen discovery. Dr. Lipkin has over 30 years of experience in diagnostics, microbial discovery and outbreak response, has mentored and trained more than 30 students and post-doctoral fellows and leads a team of over 65 investigators, post-doctoral fellows and research and support staff at Columbia University's Mailman School of Public Health. He and his team have discovered or characterized more than 500 infectious agents.

Dr. Lipkin will be called as an expert witness. He is expected to testify as to the prevalence and types of rodent-borne pathogens, including novel pathogens, in New York City.

22. **Dr. Roxolana Kashuba.** Dr. Kashuba is a deterministic and statistical modeler with 10 years of experience in environmental data analysis (water, air, ecosystems). She specializes in the development and application of modeling techniques such as probabilistic risk assessment, decision analysis, linear and nonlinear regression, multilevel hierarchical modeling, and Bayesian networks. Dr. Kashuba has provided integrated technical advice on the application of environmental models to address environmental risk questions in locations around the United States and internationally. She has experience programming in R, Matlab, SAS, Hugin, Nettica, Mathematica, Simulistics, and Vensim, as well as experience applying preprogrammed models such as PRZM-EXAMS, SCI-GROW, QUAL2E, WQSTAT, and LSPC. She is the recipient of numerous professional awards, including awards from the U.S. EPA and the Department of the Interior.

Dr. Kashuba will be called as an expert witness. Her testimony is expected to include an assessment of the probability that predators of rodents would suffer mortality as a result of secondary ingestion exposure to brodifacoum.

23. **Pastor Robert Jones.** Rev. Jones is the Senior Pastor of Oak Park United Methodist Church in Sacramento, California, and the President and CEO of the California Association of Black Pastors.

Rev. Jones will be called as a fact witness. His testimony is expected to include the impact of EPA's proposed cancellation action on low-income and minority communities.

24. **Hal Ambuter.** Mr. Ambuter is Director of Regulatory and Government Affairs, North America for Reckitt Benckiser. Mr. Ambuter is experienced in developing new products and devising strategies to seek and obtain the necessary authorizations for their market entry, and to sustain their regulatory status in accordance with federal and state requirements. In his role as director of Regulatory and Government Affairs for Reckitt Benckiser, Mr. Ambuter has had principal responsibility for the registration of Reckitt Benckiser's rodenticide products, and their compliance with state and federal regulations.

Mr. Ambuter will testify on the nature, attributes and directions for use of the products subject to cancellation and denial in this proceeding, the information generated by Reckitt Benckiser for these products' registrations, amendments Reckitt Benckiser has submitted to EPA from time to time to improve and refine these products, Reckitt Benckiser's initiatives and proposals to address EPA's concerns about rodenticide products, the specific role Reckitt Benckiser's products play in the consumer marketplace, and Reckitt Benckiser's efforts to address and respond to EPA's risk mitigation decision. Mr. Ambuter will also testify on data he has complied comparing the number of incidents involving rodenticides impacting wildlife, children and domestic animals associated with

different rodenticide products compared to the products' frequency of use. While Mr. Ambuter will testify mostly as a fact witness, he may also provide expert testimony.

25. **Dr. Duncan Watson**, Ph.D. Dr. Duncan Watson is the Scientific Services Group Manager, North America, for Reckitt Benckiser. Dr. Watson trained as an Ethologist before gaining professional experience of the comparative foraging behavior of sheep and kangaroos in the Australian outback, and as entomologist/biostatistician for a range of horticultural IPM projects throughout SE Asia. Part of his role at Reckitt Benckiser is to supervises research for, and development of the global rodent control pipeline. His work includes product innovation, new product development, and technical support for existing rodent control products. He ensures that Reckitt Benckiser products comply with EPA and state regulatory requirements for efficacy and safety. Dr. Watson is an expert in EPA testing requirements for rodenticides and in developing the data and studies to meet these requirements.

    Dr. Watson will testify about the measures Reckitt Benckiser undertakes to meet EPA efficacy and safety requirements. Dr. Watson will provide both fact and expert testimony.

26. **Christina Scharer.** Christina Scharer is the Senior Brand Manager for the d-CON product line for Reckitt Benckiser. In this role, Ms. Scharer is familiar with the market occupied by d-CON rodent-control products -- who purchases d-CON, d-CON sales, d-CON pricing, and which products and product types are d-CON's principal competitors.

    Ms. Scharer will testify to the scope and size of the rodent control product market for retail consumers, the price structure of d-CON products, the portion of the consumer market that purchases d-CON products, and the comparative market share of d-CON compared to other rodenticide products and compared to non-chemical means of rodent control. Ms. Scharer will testify primarily as a fact witness, but may also provide expert testimony.

27. **Ronald A. Faucheux.** Dr. Faucheux is the President and CEO of Clarus Research Group, a full-service survey research firm based in Washington, D.C. Dr. Faucheux has managed research projects and analyzed surveys for corporate, political, association and nonprofit clients. He is a former state legislator and Secretary of Commerce in Louisiana. In addition to his leadership at Clarus, Dr. Faucheux teaches at the Public Policy Institute at Georgetown University and the Graduate School of Political Management at George Washington University.

    Dr. Faucheux will be called as a fact witness. He is expected to testify as to the methodology and results of two surveys of rodenticide users conducted by Clarus, in 2012 and 2013, for Reckitt Benckiser.

Reckitt Benckiser's Exhibit List

Exhibit No.	Description
PRX 1	Reckitt Benckiser Statement of Objections and Request for Hearing, March 6, 2013 *(Exhibits Listed Below)*
PRX 1-1	(SOO Ex.1) Current stamped labels and artwork for all Subject Products [EPA Reg. No. 3282-03; 3282-04; 3282-09; 3282-15; 3282-65; 3282-66; 3282-74; 3282-81; 3282-85; 3282-86; 3282-87; 3282-88]
PRX 1-2	(SOO Ex.2) Registration Applications for the Pending Registrations [Provisional EPA Reg. No. 3282-RNU; 3282-RNL]
PRX 1-3	(SOO Ex.3) 2008 EPA Final Risk Mitigation Decision for Ten Rodenticides [As Amended June 24, 2008]
PRX 1-4	(SOO Ex.4) Amended/supplemented applications and related reports for the Pending Registrations [May 20, 2011 Submittal Regarding EPA Reg. Nos. 3282-RNU and 3282-RNL] *This submission consists of the following documents: 2011-05-20 Cover Letter from H. Ambuter to J. Hebert 2011-05-20 Transmittal Letter 3282-RNL 5/13/2011 Label 3282-RNU 5/3/2011 Label Vol. 1 - Preliminary Analysis: Rodenticide Exposure Trends *Subsequent* to the May 2007 Kingston Risk Mitigation Review and Post Implementation Review of the New LAAR Treatment Guidelines Vol. 2 - Preliminary Analysis of Prevalence of Rodenticide Poisoning in the U.S. Vol. 3 - Technical Memorandum: Preliminary Analysis of Population Trends of Selected Nontarget Organisms Vol. 4 - Preliminary Analyses – Increasing Resistance Problems will Lead to Increases in Rodent Populations, Rodent Bites, Rodent-Associated Diseases, and Childhood Asthma Cases Vol. 5 - Preliminary Review and Report on Impact Assessment for Proposed Rodenticide Mitigation
PRX 1-5	(SOO Ex.5) Applications for label amendment for the Proposed Label Amendments [EPA Reg. Nos. 3282-65; 3282-66; 3282-74; 3282-81; 3282-85; 3282-86; 3282-87; 3282-88]
PRX 1-6	(SOO Ex.6) Kaukeinen, 2007. "A White Paper Response to the Proposed EPA Mitigation Measures on Rodenticides of 1/17/2007"
PRX 1-7	(SOO Ex.7) Kingston, 2007. "Analysis and Comment regarding EPA description of Human Incident Data found in the 'Impact Assessment for Proposed Rodenticide Mitigation (DP 332577)"
PRX 1-8	(SOO Ex.8) Heiden, 2007. "Economic Assessment of EPA Proposed Rodenticide Risk Mitigation Decision"
PRX 1-9	(SOO Ex.9) April 20, 2012 Letter from L. Culleen to Jim Jones (with two attachments) [Concerning Sales of Bulk Products on Internet]
PRX 1-10	(SOO Ex.10) September 5, 2012 Letter from L. Culleen to Jim Jones [Concerning Sales of Bulk Products on Internet]
PRX 1-11	(SOO Ex.11) Submissions and presentations by Reckitt Benckiser to 2011 EPA Scientific Advisory Panel [Includes Volumes I through X]
PRX 1-12	(SOO Ex.12) EPA Scientific Advisory Panel Meeting Minutes

	[Dated December 29, 2011]
PRX 1-13	(SOO Ex.13) December 8, 2011 Letter from L. Culleen to Steven Bradbury Regarding SAP Meeting (with two attachments PRX 1-13-1 and 1-13-2)
PRX 1-14	(SOO Ex.14) February 20, 2012 and March 14, 2012 EPA Memoranda re: "Commensal Rodenticide Products Outdoor 50 foot Restriction for Professional use Products" [Expanding Scope of Outdoor Application Sites]
PRX 1-15	(SOO Ex.15) April 19, 2012 Health & Human Services Letter to E. Wachter (EPA) Regarding "Proposed Risk Mitigation Decision for Rodenticides"
PRX 1-16	(SOO Ex.16) April 11, 2012 Letter from Sheryl Kunickis (USDA) to Steven Bradbury Regarding Draft NOIC
PRX 1-17	(SOO Ex.17) Tomcat 16 oz. Mouse Killer I Label [EPA Reg. No. 9566.52]
PRX 1-18	(SOO Ex.18) 2004 Cadmus Group Report, "A Probabilistic Risk Assessment of the Risk of Brodifacoum to Non-Target Predators and Scavengers" (1-18-A) and 2007 "Brodifacoum: Assessment Addendum" (1-18-B)
PRX 1-19	(SOO Ex.19) November 23, 2011 Letter from L. Culleen to Robert Perlis Regarding Existing Stocks
PRX 1-20	(SOO Ex.20) Artwork Provided to EPA by Reckitt Benckiser, October 9, 2012 [Representation for Proposed Alternative Labeling]
PRX 1-21	(SOO Ex.21) Arnold & Porter FOIA Requests to EPA [2009-2013]
PRX 2	Reckitt Benckiser Comments to CDPR, October 4, 2013 *(Exhibits Listed Below)*
PRX 2-1	(RB-CDPR Ex. 1) DPR, Initial Statement of Reasons and Public Report, ("Initial Statement of Reasons")
PRX 2-2	(RB-CDPR Ex. 2) DPR Memorandum from D. Daniels, Senior Environmental Scientist, to A. Prichard, Chief, Pesticide Registration Branch, *Subject: Second Generation Anticoagulant Rodenticide Assessment* (June 27, 2013) , ("White Paper")
PRX 2-3	(RB-CDPR Ex. 3) DPR, Economic Impact Statement, *Second Generation Anticoagulant Rodenticides* (July 8, 2013) ("Economic Impact assessment)
PRX 2-4	(RB-CDPR Ex. 4) DPR, Economic Analysis for Rulemaking, Restricting Second Generation Anticoagulant Rodenticides (June 18, 2013)
PRX 2-5	(RB-CDPR Ex. 5) EPA Memorandum from A. Chiri, et al. to K. Sherman, et al., *Impact Assessment for Proposed Rodenticide Mitigation (DP 332577)* (Sep. 20, 2006) ("EPA 2006 Impact Assessment")
PRX 2-6	(RB-CDPR Ex. 6) Expert Report of Richard L. Wade, Ph.D., M.P.H., Exponent, Inc. (Nov. 16, 2011) ("Wade SAP Report")
PRX 2-7	(RB-CDPR Ex. 7) EPA Memorandum from A. Chiri, et al. to K. Sherman, et al., *Analysis of Rodenticide Bait Use* (Jan. 23, 2006) ("EPA 2006 Analysis of Rodenticide Bait Use")
PRX 2-8	(RB-CDPR Ex. 8) D. Pimentel, et al., *Environmental and Economic Costs of Nonindigenous Species in the United States* at 55, Bioscience; 50(1):53-65 (2000)
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D	citing rodenticide toxic doses for dogs and cats.
PRX 2-67-E	(RB-CDPR Ex. 67, Appendix E) Pet-related charge questions posed by the EPA to the Scientific Advisory Panel ("SAP")
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PRX 3-1	1 - Reckitt Benckiser d-CON Products Presentation (Updated 10/9/2012) *This document has been redacted as CBI
PRX 3-2	2 - Art for Proposed Label *This document has been redacted as CBI
PRX 3-3	3 - In-store Pallet Design *This document has been redacted as CBI
PRX 3-4	4 - Photo of In-store Display *This document has been redacted as CBI
PRX 3-5	5 - Art for In-store Pull Down *This document has been redacted as CBI
PRX 3-6	6 - Proposed Set of Web Pages *This document has been redacted as CBI
PRX 3-7	7 - Rodenticides Resolution Offer Sheet *This document has been redacted as CBI
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PRX 3-8-C	8C - Label Amendments for d-CON Bait Pellets II (EPA Reg. No. 3282-74) *This document has been redacted as CBI
PRX 3-8-D	8D - Label Amendments for d-CON Ready Mixed Baitbits (EPA Reg. No. 3282-81) *This document has been redacted as CBI
PRX 3-9	9 - Reckitt Benckiser September 17, 2012 Letter to Richard Keigwin Re: Follow up to August 2012 Meeting with Reckitt Benckiser *This document has been redacted as CBI
PRX 4	(1) CD Containing Incident Reports
PRX 5	(3) CDs Containing Audio Transcript of SAP Meeting, November 29, 2011-December 1, 2011.
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PRX 11	d-CON Quarter Pallet (Mockup)
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PRX 13	d-CON 72ct Quarter Pallet (Mockup)
PRX 14	3282-3 PPLS (as of March 1, 2014)
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PRX 21	3282-81 PPLS (as of March 1, 2014)
PRX 22	3282-85 PPLS (as of March 1, 2014)
PRX 23	3282-86 PPLS (as of March 1, 2014)
PRX 24	3282-87 PPLS (as of March 1, 2014)
PRX 25	3282-88 PPLS (as of March 1, 2014)
PRX 26	3282-3 (2006-08-02) Label
PRX 27	3282-4 (2006-08-02) Label
PRX 28	3282-9 (2006-08-02) Label
PRX 29	3282-15 (2006-08-02) Label
PRX 30	3282-65 (2008-10-31) Label
PRX 31	3282-66 (2008-10-31) Label
PRX 32	3282-74 (2008-10-31) Label
PRX 33	3282-81 (2008-10-31) Label
PRX 34	3282-85 (2008-10-31) Label
PRX 35	3282-86 (2008-10-31) Label
PRX 36	3282-87 (2008-10-31) Label
PRX 37	3282-88 (2008-10-31) Label
PRX 38	3282-65 (2011-07-08) 1.5 oz Wedge Artwork
PRX 39	3282-65 (2011-07-08) 3.0 oz Wedge Artwork
PRX 40	3282-65 (2011-07-08) 4ct Wedge Artwork
PRX 41	3282-66-(2010-01-28) 12oz Artwork
PRX 42	3282-74 (2011-07-08) 1.0 oz Place Pack Artwork
PRX 43	3282-74 (2011-07-08) 6 ct Place Pack Artwork
PRX 44	3282-81 (2010-01-28) 3lb Artwork
PRX 45	3282-81 (2010-01-28) 4 ct Artwork
PRX 46	2011-03-28 H. Ambuter Email to EPA Submitting 3282-65 and 3282-74 Registrations
PRX 47	2011-03-25 H. Ambuter Letter to EPA Submitting 3282-65 and 3282-74 Registrations
PRX 48	2011-03-25 (3282-65) Clean Label
PRX 49	2011-03-25 (3282-65) Red line Label
PRX 50	2011-03-25 (3282-74) Clean Label
PRX 51	2011-03-25 (3282-74) Red line Label
PRX 52	2011-03-28 L. Culleen Email to EPA regarding 3292-65 and 3282-74 Registrations (with 2011-03-25 Letter and Labels above)
PRX 53	2011-04-01 J. Hebert Email to L. Culleen re 3282-65 and 3282-74 Registrations
PRX 54	2011-04-01 D. Rosenblatt Letter to H. Ambuter re 3282-65 and 3282-74 Registrations
PRX 55	2011-04-01 L. Culleen Email to EPA regarding 3282-65 and 3282-74 Registrations
PRX 56	2009-05-13 (3282-65) Redline Revision 1 Label
PRX 57	2009-05-13 (3282-65) Clean Revision 1 Label
PRX 58	2009-05-13 (3282-74) Redline Label
PRX 59	2009-05-13 (3282-74) Clean Label
PRX 60	2012-10-11 Correspondence with EPA regarding label amendments for 3282-65, 3282-66,

	3282-74, 3282-81
PRX 61	2012-11-26 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-85
PRX 62	2012-11-26 Amendment Application for 3282-85
PRX 63	2012-11-26 Amendment Label Redline Version for 3282-85
PRX 64	2012-11-26 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-86
PRX 65	2012-11-26 Amendment Application for 3282-86
PRX 66	2012-11-26 Amendment Label Redline Version for 3282-86
PRX 67	2012-11-26 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-87
PRX 68	2012-11-26 Amendment Application for 3282-87
PRX 69	2012-11-26 Amendment Label Redline Version for 3282-87
PRX 70	2012-11-26 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-88
PRX 71	2012-11-26 Amendment Application for 3282-88
PRX 72	2012-11-26 Amendment Redline Version for 3282-88
PRX 73	2013-08-06 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-65
PRX 74	2013-08-06 Amendment Label Clean Version for 3282-65
PRX 75	2013-08-06 Amendment Redline Version for 3282-65
PRX 76	2013-08-06 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-66
PRX 77	2013-08-06 Amendment Label Clean Version for 3282-66
PRX 78	2013-08-06 Amendment Redline Version for 3282-66
PRX 79	2013-08-06 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-74
PRX 80	2013-08-06 Amendment Label Clean Version for 3282-74
PRX 81	2013-08-06 Amendment Redline Version for 3282-74
PRX 82	2013-08-06 Letter from H. Bjornson to J. Hebert Submitting Amendments for 3282-81
PRX 83	2013-08-06 Amendment Label Clean Version for 3282-81
PRX 84	2013-08-06 Amendment Redline Version for 3282-81
PRX 85	2013-08-14 Letter from EPA to H. Ambuter confirming receipt of label amendments for 3282-65, 3282-66, 3282-74, 3282-81.
PRX 86	3282 Current Label Artwork Amendment (2010-09-21)
PRX 87	2014-02-12 Correspondence from EPA Denying Amendments Submitted for 3282-65, 3282-66, 3282-74, 3282-85, 3282-86, 2382-87, 3282-88
PRX 88	2014-02-24 Correspondence from EPA Denying Amendments Submitted for 3282-81
PRX 89	Excerpts from EPA SAP Presentation on Human Incident Analysis (pp. 6, 8, 12)
PRX 90	Excerpts from EPA SAP Present. on Pet Incident Analysis (pp.7-10)
PRX 91	Almeida, Anthony, Robert Corrigan, and Ronald Sarno. "The Economic Impact of Commensal Rodents on Small Businesses in Manhattan's Chinatown: Trends and Possible Causes." Scholar Commons 1.1 (2013): University of South Florida, 3 Apr. 2013., *available at* http://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1000&context=subsust.(last visited Feb. 26, 2014).
PRX 92	Caravati et al, 2007. Long-acting anticoagulant rodenticide poisoning: An evidence-based consensus guideline for out-of-hospital management. *Clinical Toxicology*. 45, 1-22.
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PRX 96	Shepherd et al, 2002. Acute unintentional pediatric brodifacoum ingestions. Pediatric Emergency Care. Vol. 18, No. 3.

PRX 97	2011-10-31 J. Karpatkin EPA FOIA Request Letter (00185-12)
PRX 98	2011-11-01 EPA Acknowledgement Letter (00185-12)
PRX 99	2011-12-01 EPA Initial Response Email 1 of 2 (00185-12)
PRX 100	2011-12-01 EPA Initial Response Email 2 of 2 (00185-12)
PRX 101	Aggregate_Incident_Summary_Brodifacoum
PRX 102	Aggregate_Incident_Summary_Bromadialone
PRX 103	Aggregate_Incident_Summary_Bromethalin
PRX 104	Aggregate_Incident_Summary_Chlorophacinone
PRX 105	Aggregate_Incident_Summary_Cholecalciferol
PRX 106	Aggregate_Incident_Summary_Difenacoum
PRX 107	Aggregate_Incident_Summary_Difethialone
PRX 108	Aggregate_Incident_Summary_Diphacinone
PRX 109	Aggregate_Incident_Summary_Diphacinone-sodium salt
PRX 110	Aggregate_Incident_Summary_Warfarin
PRX 111	Aggregate_Incident_Summary_Zinc Phosphide
PRX 112	2013-12-17 K. Ghilain EPA FOIA Request Letter (HQ-2014-001992)
PRX 113	2013-12-18 EPA Acknowledgement Email (HQ-2014-001992)
PRX 114	2014-01-27 EPA Additional Response (2) Email (EPA-HQ-2014-001992)
PRX 115	Specified Ingredient Incidents-Brodifacoum 112701-Jan 2014
PRX 116	Specified Ingredient Incidents-Bromadiolone-112001-Jan2014
PRX 117	Specified Ingredient Incidents-Bromethalin-112802-Jan 2014
PRX 118	Specified Ingredient Incidents-Chlorophacinone-067707-Jan 2014
PRX 119	Specified Ingredient Incidents-Cholecalciferol-202901-Jan 2014
PRX 120	Specified Ingredient Incidents-Difenacoum-119901-Jan2014
PRX 121	Specified Ingredient Incidents-Difethialone-128967-Jan2014
PRX 122	Specified Ingredient Incidents-Diphacin sod salt 067705 Jan 14 2014
PRX 123	Specified Ingredient Incidents-Diphacinone-067701-Jan2014
PRX 124	Specified Ingredient Incidents-Warfarin Sod Salts-086003-Jan2014
PRX 125	Specified Ingredient Incidents-Warfarin-086002-Jan 2014
PRX 126	Specified Ingredient Incidents-Zinc phosphide-088601-Jan 2014
PRX 127	Photograph of (12455-123-3240) Tomcat "Mouse Killer II" (4 oz, Disposable)
PRX 128	Photograph of (12455-121-3240) Tomcat "Rat Killer" (4 oz, Disposable)
PRX 129	Photograph of (12455-140-3240) Tomcat “Rat Killer II” (16 oz)
PRX 130	Photograph of (12455-120-3240) Tomcat "Mouse Killer I" (16 oz)
PRX 131	Photograph of (12455-120-3240) Tomcat "Mouse Killer I" (8 oz)
PRX 132	Photograph of (12455-129-3240) Tomcat "Mouse Killer III" (4 oz)
PRX 133	Photograph of (12455-121-3240) Tomcat "Mouse Killer" (1 oz)
PRX 134	Photograph of (12455-138-3240) Tomcat “Mouse Killer X” (16 oz)
PRX 135	Photograph of (7173-293-239) Ortho Home Defense Max (4 oz)
PRX 136	Photograph of Victor Disposable Rat Trap (1ct)
PRX 137	Photograph of Victor Disposable Mouse Trap (4ct)
PRX 138	Photograph of (3282-65) d-CON “Mouse Prufe II” (1.5 oz)
PRX 139	Photograph of (3282-66) d-CON “Bait Pellets” (12 oz)
PRX 140	Photograph of (3282-74) d-CON “Bait Pellets II” (6 oz)
PRX 141	Photograph of (3281-81) d-CON “Ready Mixed Baitbits” (12 oz)
PRX 142	Photograph of Revised Box for (3282-81) d-CON “Ready Mixed Baitbits” (12 oz)
PRX 143	Receipt for 3-6-14 Amazon.com Purchase of Consumer Rodenticide Products
PRX 144	Receipt for 3-5-14 Target (Falls Church) Purchase of Consumer Products
PRX 145	Receipt for 3-5-14 Home Depot (Falls Church) Purchase of Consumer Products

PRX 146	Receipt for 3-6-14 Home Depot (Alexandria) Purchase of Consumer Products
PRX 147	Bill Jacobs (04-24-2008) FOIA Document
PRX 148	California Roadkill Observation System Database http://www.wildlifecrossing.net/california/map/roadkill
PRX 149	California Roadkill Observation System Webpage
PRX 150	U.S. EPA, "Science Policy Issues and Guidance Documents." URL: http://www.epa.gov/pesticides/trac/science/#fqpa. (Accessed 3/10/14)
PRX 151	2010-08-11 Reckitt Benckiser Correspondence regarding NY Sales
PRX 152	Prescott, C.V. Efficacy assessment of a 50 ppm bromadiolone formation - 15 day choice test, using Standard EPA Meal as the challenge diet, against male resistant house mice that are homozygous for the VKORC1 mutation Tyr139Cys, University of Reading, VPU/13/026 (2014).
PRX 153	PR Notice 94-7. URL: http://www.epa.gov/PR_Notices/pr94-7.html (Accessed Last: 3/13/14).
PRX 154	Standard Norway Rat/Roof Rat Anticoagulant Dry Bait Laboratory Test Method; OPP Designations: 1.203, 1.204, 1.209, 1.210, 1.213, 1.214, 1.217
PRX 155	Environmental Fact Sheet, Risk/Benefit Balancing Under the Federal Insecticide, Fungicide, and Rodenticide Act, Office of Pesticides and Toxic Substances, U.S. EPA, Washington, D.C. February 1990.
PRX 156	Product Performance Test Guidelines, OPPTS 810.1000 Overview, Definitions, and General Considerations, U.S. EPA, March 1998.
PRX 157	EPA Reregistration Eligibility Decision (RED): Rodenticide Cluster, July 1998
PRX 158	2012-11-26 Amendment Label Clean Version for 3282-85
PRX 159	Fairbrother CV
PRX 160	Stroud CV
PRX 161	Kashuba CV
PRX 162	Brewer CV
PRX 163	McGonegal CV
PRX 164	Kingston CV
PRX 165	Brutlag CV
PRX 166	McCluskey CV
PRX 167	Chyka CV
PRX 168	Hillman CV
PRX 169	Mileson CV
PRX 170	Poppenga CV
PRX 171	Gessner CV
PRX 172	Meyer CV
PRX 173	Cantor CV
PRX 174	Prescott CV
PRX 175	Buckle CV
PRX 176	Pelz CV
PRX 177	Kohn CV
PRX 178	Tinsworth CV
PRX 179	Hall CV
PRX 180	Ambuter CV
PRX 181	Watson CV
PRX 182	Scharer CV
PRX 183	Lipkin CV
PRX 184	Faucheux CV

PRX 185	Jones CV
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PRX 192	Murphy et al., 2005. Population Biology of the Urban Mouse (*MUS DOMESTICUS*) in the UK.
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PRX 329	Brutlag 2: Comparison of SGAR and bromethalin rodenticide cases documented by Pet

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PRX 331	Veterinary treatment plans and cost estimates associated with treatment for asymptomatic and symptomatic pet exposures involving various rodenticides. Prepared by Dr. Katherine Peterson and Dr. Ahna Brutlag.
PRX 332	CDPR Domestic Animal and Wildlife Adverse Effects Reporting Data for bromethalin spanning the reporting period of August 1, 2011-September 11, 2013. Prepared by Dr. Ahna Brutlag.
PRX 333	Comparison of SGAR and bromethalin rodenticide cases documented by Pet Poison Helpline (PPH) between July 2009 and December 2013. Prepared by Dr. Ahna Brutlag.
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PRX 381	American Housing Survey 2007
PRX 382	American Housing Survey 2009
PRX 383	American Housing Survey 2011
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PRX 386	Figure 2. Median home mouse allergen level, by study and collection site. Prepared by Brad Gessner.
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PRX 416	Table 4. Infectious diseases transmitted directly by rodents. Prepared by Brad Gessner.
PRX 417	Table 5. Infectious diseases transmitted indirectly by rodents. Prepared by Brad Gessner.
PRX 418	Table 6. Rodent-borne infectious diseases, adapted from Meerburg 2009. Prepared by Brad Gessner.
PRX 419	Table 7. Annual estimated rodent bite cases and outcomes in major metropolitan areas of the Eastern US seaboard and California. Prepared by Brad Gessner.
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CERTIFICATE OF SERVICE

I certify that the foregoing Report of Prehearing Exchange dated March 14, 2014, was served at the addresses listed below in the manner indicated.

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