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REVIEW NO.

EEB REVIEW

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TYPE PRODUCT(S) : I, D, H, F, N, R, S Rodenticide/Predacide

DATA ACCESSION NO(S). \_\_\_\_\_

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) 1080

COMPANY NAME New Mexico Department of Agriculture

SUBMISSION PURPOSE Review of Protocol for Monitoring Study of  
Livestock Protection Collar to Support  
Registration.

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION 3 A.I.

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Environmental Safety Review  
Fish and Wildlife

100.0 Submission purpose and label information

The New Mexico Department of Agriculture has submitted a proposed label, Technical Bulletin and a design for monitoring study in support of a "me too" registration for the use and performance of the Compound 1080 Livestock Protection Collar.

101.1 Discussion

The requirement to conduct a study to monitor the use and performance of the 30 ml Compound 1080 Livestock Protection Collar was set forth by the Agency to determine how effectively the New Mexico Department of Agriculture could administer the program and prevent some of the past misuse that was associated with this chemical. The Agency believes that close monitoring of the use and performance of the collar and accurate record keeping on the number of collars used and disposed of is essential to ensure that this very highly toxic material is used in accordance with all label restrictions and will not pose any unreasonable adverse effects to human health or the environment.

The objectives of the proposed monitoring study are:

1. Insure that collar use complies with use restrictions.
2. Document effectiveness of LP collars
3. Record the level of collar use.
4. Determine the frequency of events such as:
  - a. coyote attacks on collared sheep
  - b. collar punctures during coyote attacks
  - c. accidental punctures
  - d. loss of collars
  - e. nontarget species mortality due to collar use
  - f. accidents incidental to collar use
5. Collect information to improve the effectiveness of LP collars in use.
6. Provide information sufficient for annual reports required by EPA.
7. Provide information needed by EPA to determine when this monitoring study may be discontinued.

102.0 Adequacy of Data Submission

A. Record Keeping:

The standardized report forms (see attached) should provide sufficient information to keep accurate records on the use, performance and disposal of the toxic collars. This should greatly reduce the opportunities for any unauthorized use of the collar.

B. Product Labeling:

The Precautionary Statements, Environmental Hazards, and Directions for Use Sections of the label are adequate.

Collar Size

Somewhere on the label it should specifically state that these label statements apply only to the small (30 ml) collar. The label, as currently written applies to the large collar. (i.e., net contents: 60.8 grams/ large collar.) However, only the 30 ml collar should be registered.

Endangered Species Considerations

This heading should all be in capital letters.

Direction for Use

Must state "For use only in the State of New Mexico"

C. Technical Bulletin Use Restrictions:

Number 8: The EEB believes that allowing use in areas where annual precipitation is less than 20 inches and the vegetation of the pasture is sparse.. makes very little difference if topographical features of such pastures are not also considered. In fact, Branch reviewers, with on the ground experience in western states, believe that very few, if any, ranching operations in the west could bear the additional expense or take the time to routinely ground search (according to use restrictions every 7 days) for collared animals that could be spread over a 15.6 sq. mile (10,000 acres) area. Instead the EEB recommends that fenced pastures should be limited to no more than 2,560 acres (4 sq. miles) in size. Even with this size limitation there will be some areas where an effective search for collared animals would be greatly hindered by vegetative and topographical features. The current size limitation amounts to an open range use.

Number 12: The use restriction states, "Leaking or punctured collars must be properly disposed" and implies that the user may dispose of the collar. The statement should be changed to read: "Leaking or punctured collars should be returned to the New Mexico Department of Agriculture for proper disposal." This would be consistent with Use Restriction # 13.

103.0 Endangered Species

On March 21, 1985, the EEB requested formal Section 7 Consultation relative to the United States Department of Interior's application to register thhe Compound 1080 Livestock Protection Collar. On June 14, 1985, the USFWS-OES responded and determined that the use of the 1080 collar, as proposed, posed no jeopardy to the bald eagle, San Joaquin kit fox, black-footed ferret and gray wolf but was likely to jeopardise the continued existence of the grizzly bear, Rocky Mountain wolf and the California condor.

At this time the USFWS-OES provided specific state and county recommendations for avoiding adverse effects to non-jeopary species as well as reasonable and prudent alternatives for precluding jeopardy to the Rocky Mountain wolf, grizzly bear and California condor. Based upon this information, the EEB developed label precautions aand use restrictions for the 1080 toxic collar.


The EEB realized that because of the amount of time that had elapsed since the June 14, 1985 Biological Opinion was rendered, significant changes may have occurred which could have altered the original opinion. As such, EEB contacted Mr. Wayne Wathen, Regional Coordinator for Section 7 Consultation, at the USFWS Region 6 field office in Denver, Colorado, to determine if there were any new endangered species that had been listed since the 1985 Biological Opinion. Mr. Wathen said he was unaware on any new species listings that would require additional use restrictions.

104.0 Conclusions

The EEB has completed its review of the New Mexico Department of Agriculture's proposed label, Technical Bulletin- Use Restrictions, and monitoring protocol to support their "me too" registration of the Compound 1080 Livestock Protection Collar. With the exception of those changes/recommendations, as noted under Section 102, the EEB concludes that the protocol, label and Technical Bulletin-Use Restrictions are adequate to support the registration. The EEB further concludes that the recommendations/reasonable and prudent alternatives provided in the June 14, 1985 USFWS-OES Biological Opinion are still valid and that reinitiation of Section 7 consultation is not required at this time.

The EEB notes, however, that the two pivotal studies, conducted by the Denver Wildlife Research Center, (DWRC) required to support the 1080 toxic collar registration have been found to be invalid (See review by R. Felthousen). The EEB has requested that the DWRC address the problems identified with these studies or conduct new studies following acceptable laboratory practices. Upon correction or completion of the new studies, the EEB will complete a final hazard assessment for the 30 ml. toxic collar.

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