IRB/TSS PRECAUTIONARY LABEL REVIEW

PM: 16
OUT: 03-29-88
EPA REG NO: 39508-E
COM: NAC
IN PLR: 03-23-88
DUE: 05-23-88
PRODUCT NAME: SODIUM FLUOROACETATE
LIVESTOCK PROTECTION COLLAR
AC: 160
RN: 207549

COMPANY NAME: NEW MEXICO
DEPT., OF AGRICULTURE
LAS CRUCES, NM. 88003

FORMULATION: SODIUM FLUOROACETATE ............... 1.04%
INERT INGREDIENTS ............... 98.96%

INTRODUCTION
New product registration.

USES
For use on sheep and goats to kill depredating coyotes. The collar is a rubber bladder containing a solution of sodium fluoracetate (1080), with neck straps for attachment to a sheep or goat.

SUBMITTED DATA
Product label, technical bulletin, individual collar labeling, and warning sign.

CONCLUSIONS
1. PRODUCT LABEL COMMENTS:
   a) Is this product only for the state of New Mexico?, If so the Restricted Use statement needs to say so.

   b) Only the label for the large collar was submitted for review, comments are for the small collar also.

   c) Add: "Collars are not recommended for animals under 25 pounds";

   d) Endangered Species statement needs to be rewritten based on OES identification of threatened species in the state of NM.
e) Product label advises the use of syrup of ipecac and in the technical bulletin suggest that this material is provided with the collars. Number 17 needs to be rewritten to clarify this.

f) Under Note to Physician, please add below TREATMENT statement.

"CAUTION: The use of parenteral monacetin is hazardous. Technical grade material contains glycerin which, in adequate dosage, may cause hemolysis, hypotension, convulsions, and paralysis. If a non-sterile solution is injected, the monacetin should be cultured to guide the administration of antibiotics if sepsis develops."

(USEPA, RECOGNITION AND MANAGEMENT OF PESTICIDE POISONINGS 3RD ED.)

e) We recommend adding to the individual collar wording and to the warning sign, "FATAL IF SWALLOWED".

[NOTE TO PM: We had someone look at the label language who is fluent in Spanish, he recommended that the comma be change to an period (see first line of text) that confusion arises in the grammatical interpretation of a comma.]