FILE OR REG. NO. 39508-2

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 10/27/89

DATE OF SUBMISSION 10/19/89

DATE SUBMISSION ACCEPTED 11/6/89

TYPE PRODUCTS(S): I, D, H, F, N, R, S

DATA ACCESSION NO(S). none

PRODUCT MFR. NO. 16

PRODUCT NAME(S) SODIUM FLUOROACETATE IN LIVESTOCK PROTECTION COLLAR

COMPANY NAME New Mexico Department of Agriculture

SUBMISSION PURPOSE provide production information

CHEMICAL & FORMULATION 1.04% Sodium Fluoroacetate in Livestock Protection Collar
200.0 INTRODUCTION

200.1 Uses

A 1.04% Sodium Monofluoroacetate (Compound 1080) solution enclosed in a two-pouched rubber vessel which is attached to Velcro bands which hold the pouches in place in the throat regions of sheep or goats subject to predatory attacks by coyotes.

200.2 Background Information

See efficacy reviews of 3/21/88 and 10/21/89 and EPA's letters of 4/11/88 and 11/4/88. The current submission consists of a letter dated 10/19/89 in which "NMDA reports no production of this product".

NMDA's letter was sent "to comply with Section 4.f.b." of EPA's letter of 11/4/88. That section had stated that NMDA must submit

"... production information (pounds or gallons produced) for this product for the fiscal year in which the use for predator control is conditionally registered, in accordance with FIFRA section 29. The fiscal year begins October 1 and ends September 30. Production information will be submitted to the Agency no later than November 15 following the end of the preceding fiscal year."

201.0 DATA SUMMARY

No efficacy data were submitted.

NMDA seems to have complied with the letter and spirit of EPA's stipulation. This conclusion assumes that NMDA recognizes that "production" would includes NMDA's putting its labels on collars made and filled by another party (e.g., Rancher's Supply, Inc., of Alpine, TX).

202.0 CONCLUSION

No response is necessary.

William W. Jacobs
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December 1, 1989