

US EPA ARCHIVE DOCUMENT

10-22-90

IRB BRANCH REVIEW - TSS

Record Number(s)

D155381
S381611

IN 9/7/90 CUT 10/22/90

EFFICACY

FILE OR REG. NO. 39508-2

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED 9/6/90

DATE OF SUBMISSION 8/31/90

DATE SUBMISSION ACCEPTED 9/7/90

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

DATA ACCESSION NO(S). none

PRODUCT MGR. NO. 16

PRODUCT NAME(S) SODIUM FLUOROACETATE (COMPOUND 1080) IN THE LIVESTOCK PROTECTION COLLAR

COMPANY NAME New Mexico Department of Agriculture

SUBMISSION PURPOSE Clear up past problems

CHEMICAL & FORMULATION 1.00% Sodium fluoroacetate solution in Livestock
Protection Collar

1
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Efficacy_Review: SODIUM FLUOROACETATE (COMPOUND 1080) IN THE LIVESTOCK PROTECTION
COLLAR, 39508-E
New Mexico Department of Agriculture
Las Cruces, NM 88003

200.0 INTRODUCTION

200.1 Use

A 1.00% 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, 10/21/88, 3/6/89, and 12/1/89, along with other information in product jacket. The current submission consists of a letter of 8/31/90 to which are appended

- a. copies of letters exchanged by NMDA and EPA over the past two years;
- b. copies of revised labeling; and
- c. a hand-written "spread sheet" regarding collar use in New Mexico in calendar year 1989.

201.0 DATA SUMMARY

No efficacy data were submitted.

The "spread sheet" indicates that 180 collars were sold to nine parties in New Mexico in 1989. Of these, 159 were used on eight livestock operations for a total of 4169 collar-days. No collars were reported to have been lost. Ten were reported to have been punctured by coyotes. No collars were reported to have been ruptured by other causes. On each of the six ranches where collars were reported to have been punctured by coyotes, predation was said to have ceased following collar puncture. The only adverse incident reported that involved nontarget species was the capture of a sheep in a trap.

If the results summarized in the table are "the whole truth," the collar program in New Mexico in 1989 can be described as "successful."

Of the past correspondences provided by NMDA, the following do not appear in the product jacket for 39508-2:

- a. NMDA's letter of 1/19/90; and
- b. NMDA's application amendment of 10/20/89, which included a formulation change to replace Rhodamine B dye with Tartrazine.

In this review, I leave the issue of blame for missing information aside and comment only on the revised labeling.

The "DIRECTIONS FOR USE" portion of the revised container label is acceptable.

The technical bulletin has some errors in it. It also lacks figures, figure captions, and copies of the container label and the bilingual warning signs.

202.0 CONCLUSIONS

The "spread sheet" for collar use in New Mexico for calendar year 1989 suggest a successful program for that year. Be sure to submit complete monitoring reports for each year of collar use.

The "DIRECTIONS FOR USE" portion of the revised container label is acceptable.

Make sure that appendices (container label and bilingual warning signs) are included with each copy of the technical bulletin that is shipped with collars. Also make sure that figures and figure captions are included in each copy of the technical bulletin that is shipped with collars.

You must make the changes listed below to your technical bulletin (based on the copy submitted with your letter of August 31, 1990).

1. On page 3, delete "and 15" from the ninth "DO" ("report any suspected poisoning . . .").
2. On page 8, first paragraph,
 - a. change "there" to "their" in fourth line, and
 - b. insert "that" between "satisfied" and "the" in the seventh line.
3. On page 8, fourth paragraph,
 - a. change "One" to "Once" in first line, and
 - b. change "orange" to "yellow" in the sixth line.
4. On page 8, last paragraph, change "60 day" to "60-day" in second line.
5. On page 9, fourth paragraph, change "may by" to "made by" in fourth line.
5. On page 9, sixth paragraph, change "double bag" to "double-bag" in third line.

William W. Jacobs
Principal Specialist: Rodenticides
Insecticide-Rodenticide Branch
October 22, 1990

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William W. Jacobs
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Insecticide-Rodenticide Branch
October 22, 1990

Compound 1080 LP Collar
 Annual Use Record
 Use Season (Year) 1981
 Page 2 of 2

NEW MEXICO Dept. of Agriculture

		No. Purchased	Date	No. Used	No. Days	Collar Days	No. Lost	Average No. Days Until Lost	No. Collars	Average No. Days Until Ruptured	No. Reservoirs Ruptured	No. Collars	Average No. Days Until Ruptured	No. Reservoirs Ruptured	Coyote Caused Ruptures	Thorn Caused Ruptures
7	Applicator ID No. C-1080-0083 County OTERO**	20	6-23-81	20	42840	0	NA	0	NA	0	0	0	0	0	0	0
8	Applicator ID No. C-1080-0049 County OTERO**	20	6-23-81	20	35391	0	NA	0	NA	0	0	0	0	0	0	0
9	Applicator ID No. C-1080-0006 County LEA	20	5-1-89	20	13140	0	NA	0	12	10	0	3	0	0	0	0
	Applicator ID No. County															
	Applicator ID No. County															
	Applicator ID No. County															
	NM STATE TOTALS	180		159	205,910	0	NA	0	10	5	13	0	0	0	0	0
	Line and Column Summaries															

May not equal number used X number days due to early removal of damaged collars

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P3.10.10

Compound 1080 LP Collar Annual Use Record Use Season (Year) 1989 Page 1 of 2

NEW MEXICO DEPARTMENT OF AGRS.

Coyote Caused Ruptures Thorns/Cactus Caused Ruptures

	No. Purchased	Date	No. Used	No. Days	Collar Days	No. Lost	Average No. Days Until Lost	No. Collars	Average No. Days Until Ruptured	No. Reservoirs Ruptured	No. Collars	Average No. Days Until Ruptured	No. Reservoirs Ruptured	No. Collars	Average No. Days Until Ruptured	No. Reservoirs Ruptured
1) Applicantor ID No. C-1080-0004 County CHAVES	20	2-17-89	20	10200	⊕	N/A	01	08	01	⊕	⊕	⊕	⊕	⊕	⊕	⊕
2) Applicantor ID No. C-1080-0043 County CHAVES	10	5-30-89	0	-	-	-	-	-	-	-	-	-	-	-	-	-
3) Applicantor ID No. C-1080-0012 County EDDY	20	8-9-89	20	37694	⊕	NA	03	13	05	⊕	⊕	⊕	⊕	⊕	⊕	⊕
4) Applicantor ID No. C-1080-0016 County EDDY	30	6-17-89	29	25709	⊕	NA	01	09	01	⊕	⊕	⊕	⊕	⊕	⊕	⊕
5) Applicantor ID No. C-1080-0064 County CHAVES	20	7-25-89	20	21361	⊕	NA	02	04	02	⊕	⊕	⊕	⊕	⊕	⊕	⊕
6) Applicantor ID No. C-1080-0082 County OTERO **	20	6-23-89	19	42794	⊕	NA	01	38	01	⊕	⊕	⊕	⊕	⊕	⊕	⊕
SUB-TOTALS	120	-	99	1352958	⊕	N/A	08	-	10	⊕	⊕	⊕	⊕	⊕	⊕	⊕

Line and Column Summaries

1/ May not equal number used X number days due to early removal of damaged collars

