Record Number(s)
D162087

FILE OR REG. NO. 39508-2

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 2/20/91
DATE OF SUBMISSION 2/15/91

DATE SUBMISSION ACCEPTED 3/6/91

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 report on use in 1990

CHEMICAL & FORMULATION 1.00% Sodium Mono-fluorooacetate
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, 12/1/89, and 10/22/90, along with other information in product jacket. The current submission consists of a letter of 2/15/91 to which are appended

a. a copy of a page from an EPA letter (apparently the acceptance letter of 11/4/88) which stipulates reporting requirements; and

b. a hand-written "spread sheet" regarding collar use in New Mexico in calendar year 1990.

As indicated in EPA's letter of 11/19/90, NMDA must revise the labeling for this product.

201.0 DATA SUMMARY

No efficacy data were submitted.

The "spread sheet" (filled out in red, non-water-resistan ink) and cover letter indicate that 105 collars were purchased 5 parties in New Mexico in 1990. In 1989, 180 collars were purchased by 9 parties in the state. According to the cover letter, New Mexico maintains no inventory of collars and does not sell them. Instead the state

"... tracks the request for purchase by the licensed applicator to the manufacturer and conducts yearly on-the-ground inspections to ensure program integrity and compliance."

I am not sure that EPA ever had the understanding that collar users in New Mexico purchase collars, presumably bearing NMDA's label, directly from the collar producer, Rancher's Supply, Inc., Alpine, TX. NMDA states that this is indeed what happens and, therefore, claims

"... no production of sodium fluoroacetate (Compound 1080) or the LPC's which are conditionally registered for predator control."

Of all of the collars purchased for use in New Mexico, 122 reportedly were used on six livestock operations for a total of 2716 collar-days. Three collars were reported to have been lost. Six were reported to have been punctured by
coyotes. Four collars were reported to have been ruptured by thorns. None were said to have been ruptured by other causes. On each of the four ranches where collars were reported to have been punctured by coyotes, predation was said to have ceased following collar puncture.

No adverse incidents involving collar use were reported.

If the results summarized in the table are "the whole truth," the collar program in New Mexico in 1990 could be described as "successful" if one overlooks the fact that all use of the collar in New Mexico on 1989 and 1990 occurred without the State's certification and training program having been formally approved by EPA.

202.0 CONCLUSIONS

Our past statements regarding use of this product under this registration number were based upon our assumption that you had obtained, or would obtain prior to transfer of collars to users, formal and timely approval of a certification and training program from other offices within EPA. As it has come to our attention that such approval has not been obtained, it appears to us that all past and current uses of the Livestock Protection Collar under this registration technically have been illegal. We urge you to take immediate action to rectify this situation.

The "spread sheet" for collar use in New Mexico for calendar year 1990 suggests a successful program for that year, although few details were provided to go with the data and reported collar use was limited. Be sure to submit complete monitoring reports for each year of collar use. Future monitoring reports should include narrative regarding monitoring procedures and discussions of results. Future data table entries must be made using a substance more durable than non-water-resistant red ink.

In our letter of November 19, 1990, we noted that acceptance of your revised labeling would be withheld until you made certain amendments to your technical bulletin. We are surprised that we have not received an amended bulletin as of this time.

William W. Jacobs  
Principal Specialist: Rodenticides  
Insecticide-Rodenticide Branch  
April 30, 1991
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