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IRB BRANCH REVIEW - TSS

Record Number(s)

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IN 10/4/93 OUT 10/6/93

EFFICACY

FILE OR REG. NO. 39508-2

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 9/29/93

DATE OF SUBMISSION 9/9/93

DATE SUBMISSION ACCEPTED 10/4/93

TYPE PRODUCT(S): I, D, H, F, N, R_x S

DATA ACCESSION NO(S) none

PRODUCT MER. NO. 14

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

COMPANY NAME New Mexico Department of Agriculture

SUBMISSION PURPOSE Gain acceptance of use of large-size collar in addition to small size

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

Efficacy Review: SODIUM FLUOROACETATE (COMPOUND 1080) LIVESTOCK PROTECTION COLLAR,
39508-2
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, 12/1/89, 10/22/90, 4/30/91, 10/16/91, and 3/30/92, along with other information in product jacket. The current submission consists of a letter of 9/9/93 to which are appended five copies of a proposed revised container label, a registration amendment form, assorted EPA ("me-too") forms, and a copy of a permission-to-cite-data letter of 8/4/91 from the Animal and Plant Health Inspection Service (APHIS) of the USDA. The purpose of this submission is for NMDA to secure EPA's approval for use of large-size Livestock Protection Collars, containing the same amount of 1080 solution as is used in the small collars, under the this product's registration.

APHIS already has had such an amendment to the registration of its toxic collar (56228-22) accepted by EPA, as has Rancher's Supply (46779-1) of Alpine, TX.

201.0 DATA SUMMARY

No efficacy data were submitted.

As NMDA did not submit a proposed revised technical bulletin, this amendment application cannot be accepted at this time.

The proposed revised container label has several unannounced changes in the "PESTICIDE DISPOSAL" section. My specific comments on the proposed revised container label appear under "CONCLUSIONS."

202.0 CONCLUSIONS

Your request of to amend the registration of this product to permit use of large-size collars cannot be accepted at this time. You must submit five copies of a complete and appropriate proposed revised technical bulletin as well five copies of a proposed revised container label. The revised technical bulletin must acknowledge the existence of the large-size collars and provide guidance on when they should be used. We suggest that you refer to the labeling which we recently (July 19, 1993) accepted for the Livestock Protection Collar product (56228-22) registered to the Animal and Plant Health Inspection Service (APHIS) of the U.S. Department of Agriculture.

We have examined the proposed revised label for the collar container and find that the changes identified below are needed.

1. Restore the second paragraph under "PESTICIDE DISPOSAL" so that it once again reads

"Dispose of wastes contaminated by 1080 (carcasses, wool, hair, vegetation, soil, leather clothing, and water) under three feet of soil, at a safe location, preferably on property owned or managed by the applicator and at least one-half mile from human habitations and water supplies."

2. Combine fourth and fifth paragraphs under "PESTICIDE DISPOSAL," those pertaining to incineration, into one single paragraph.

William W. Jacobs
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October 6, 1993