

IRS EFFICACY REVIEW

IN 10/3/84 OUT 10/22/84

FILE OR REG. NO. 400-UE0

PETITION OR EXP. PERMIT NO. \_\_\_\_\_

DATE DIV. RECEIVED 9/18/84

DATE OF SUBMISSION 9/4/84

DATE SUBMISSION ACCEPTED 10/3/84

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

DATA ACCESSION NO(S): 254782 (no applicable performance data there in)

PRODUCT NBR. NO. 16

PRODUCT NAME(S) HINDER DEER & RABBIT REPELLENT (FOR HOME USE)

COMPANY NAME Uniroyal, Inc.

SUBMISSION PURPOSE Registration

GENERAL FORMULATION: 15% AMMONIUM SOAPS OF HIGHER FATTY ACIDS LIQUID  
FORMULATION

Efficacy Review: HINDER RABBIT & DEER REPELLENT (FOR HOME USE), 400-UEO  
Uniroyal, Inc.  
Bethany, CT 06525

200.0 INTRODUCTION

200.1 Uses

A 15% "Ammonium Soaps of Higher Fatty Acids" liquid formulation to be used to repel deer and rabbits from "fruit trees, vegetables, vine crops, flowers, roses, ornamentals, shrubs, trees and nursery stock."

200.2 Background Information

[REDACTED] 400-383 (nee 1148-13) which was registered in the 1950s as a spreader sticker with a variety of fungicidal and insecticidal claims. In the early 1970s, the parent product was given a state registration in California as a cervid (deer) and lagomorph (rabbits and hares) repellent.

In 1979, the manufacturer applied for amended registration to add the mammal repellent claims to the federal label. Even though efficacy data were not required, some "semi-studies" and testimonial accounts were submitted to the Agency. These accounts were discussed briefly in the efficacy review of 1979. However, the product's formulation may have changed once or twice since the work reported in the accounts was performed.<sup>1</sup> It is, therefore, highly unlikely that the current product formulation is supported by any information on hand with the Agency.

The current product submission (400-UEO) is an attempt to present a label for the homeowner, with mixing directions scaled to units which are appropriate for small applications.

201.0 DATA SUMMARY

No new efficacy data were submitted.

The new "Foliage Spray" mixing directions call for use of the product undiluted in an ORTHO Sprayette or diluted at the rate of 5 1/3 oz. product per gallon of water and applied with a power sprayer. The parent product bears directions for mixing the product at one pint (16 oz.) to one quart (32 oz.) per 5 gallons of water. This amounts to 3.2 - 6.4 ounces of product per gallon of water, roughly the equivalent of the amounts recommended to the homeowner.

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<sup>1</sup> The file for the parent product shows three Confidential Statements of Formula (dated 1971, 1979, and 1983) which appear to differ from one another in the eyes of this nonchemist. The 1983 CSF might be only a correction of the 1979 label and not an actual change (see registrant's letter of 6-14-83 for 400-383).

COMMERCIAL/FINANCIAL INFORMATION IS NOT INCLUDED

The directions for 400-UEO also call for using the product in a 1:1 dilution with water to be painted directly on tree trunk. These directions also appear on the label of the parent product.

## 202.0 CONCLUSIONS

The use directions offered for this product are consistent with those which appear on the label for the registered product 400-383. Assuming that the registered product is effective, this one would also be expected to work.

The available information on hand regarding product performance is sketchy and may have been generated with an earlier formulation. The PM's options are to request efficacy data now or to advise the manufacturer that such data must be generated and will be requested in the future. Due to the "limbo" status of the reinstatement of efficacy data requirements for vertebrate pesticides, I recommend the second approach.

Two minor label changes are indicated:

1. On the front panel, the change "of" to "by" in the sentence "Protects plants from . . . rabbits."
2. Under "DIRECTIONS FOR USE", delete ". . . yet is not offensive to humans," and "Animals are not harmed."

William W. Jacobs  
Biologist  
IRB/TSS  
October 22, 1984