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JUL 15 1987

MEMO

Subject: 1080 Livestock Protection Collar (LPC)

To: Herbert Harrison, Chief
Insecticide/Rodenticide Branch
Registration Division (TS-767-C)

From: Michael W. Slimak, Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

I am writing with reference to the June 29, 1987 letter from Galen L. Buterbaugh (copy attached) of the U.S. Fish and Wildlife Service. Note his concurrence that the Denver Wildlife Research Center (DWRC) addresss problems related to two studies submitted to support registration of use of 1080 in the LPC or conduct these studies again. The DWRC lab was audited on July 14-16, 1986 by an interagency team. An number of deficiencies were found for several studies investigated.

Mr. Buterbaugh believes that no approvals for the LPC be released (registrations issued) for the LPC until the issue is resolved to the satisfaction of EPA. The specific studies in question are entitled:

1. "Primary Hazard of the 1080 Toxic Collars to Skunks and Golden Eagles" and
2. "Estimated Doses of Sodium Fluroroacetate Delivered to Coyotes by Toxic Collars"

The deficiencies of these studies are identified in EEB's review dated 11/24/86. Essentially, DWRC must resubmit raw data and other pertinent missing information relative to these studies. If this information is submitted and does not significantly alter the reported results, they may be adequate to support registration of the LPC.

With this written concurrence by the FWS, EEB recommends that registration for use of 1080 in the LPC should be with-held pending resolution of the issue, (i.e., how can we guarantee that the data will be re-done?). If LPCs are registered they should be conditional based on the successful re-conduction of these studies.

cc: OGC/Wm. Jordan



United States Department of the Interior
FISH AND WILDLIFE SERVICE

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IN REPLY REFER TO:

SE/EPA-1080 Toxic Collar
Mail Stop 60153

MAILING ADDRESS:

Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:

134 Union Blvd.
Lakewood, Colorado 80228

JUN 29 1987

M. W. Slimak, Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769C)
Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Slimak:

This responds to your May 1, 1987, letter regarding the Service's July 11, 1985, biological opinion for the use of Compound 1080 (sodium monofluoroacetate) in Livestock Protection Collars. Your letter referred to a December 17, 1986, letter to the Texas Department of Agriculture from the Houston Field Office of the U.S. Fish and Wildlife Service (Service). This letter proposed additional restrictions on the use of 1080 Livestock Protection Collars not included in the 1985 biological opinion.

After review and discussion with Region 2, we have concluded that the 1985 biological opinion does not warrant the revisions included in Houston's letter. Therefore, the Service does not recommend implementing the restrictions included in the December 17, 1986, letter. However, we have no objection to any decision made by the Texas Department of Agriculture to implement these restrictions as long as applicants are not directed to contact the Service for any needed approval. If an approval is required for using the collar as a result of these additional restrictions, it should be issued by the State of Texas or by the Environmental Protection Agency.

Regarding the two studies conducted by the Denver Wildlife Research Center (Center) that were declared to be invalid by the Environmental Protection Agency, we strongly support your request of the Center to either address the identified problems or conduct new studies following acceptable laboratory practices. ~~We believe that no approvals for use of the 1080 Livestock Protection Collars for predator control should be released until this issue is resolved to the Environmental Protection Agency's satisfaction.~~ If the corrected or reconducted studies indicate an increased likelihood for risk to threatened or endangered species that was not considered in the 1985 biological opinion, the Environmental Protection Agency should reinitiate formal Section 7 consultation for the 1080 Livestock Protection Collar.

This concludes our comments. Thank you for the opportunity to provide them.

Sincerely,

Galen L. Buterbaugh
GALEN L. BUTERBAUGH

Regional Director