

4-30-91

D162087

3/6/91 4/30/91
IN COT

EFFICACY

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^x, 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 Monofluoroacetate

$$\frac{1}{2}$$

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, 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-resistant ink) and cover letter indicate that 105 collars were purchased by 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

Compound 1080 LP Collar

Annual Use Record

Use Season (Year) 1990

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		No. Purchased	Date	No. Used	No. Days	Collar Days	No. Lost	Average No. Days Until Lost	No. Collar
Applicator ID No.	C-1080-0042	20	2/17/89	0	0	0	0	0	0
County	CHAVES								
Applicator ID No.	C-1080-0043	10	5/30/89	0	0	0	0	0	0
County	CHAVES								
Applicator ID No.	C-1080-0012	20	8/9/89	0	0	0	0	0	0
County	Eddy								
Applicator ID No.	C-1080-0016	30	6/17/89	0	0	0	0	0	0
County	Eddy								
Applicator ID No.	C-1080-0082	20	7/25/90	39	28	872	1	8	2
		20	6/23/89						
County	OTERO								
Applicator ID No.	C-1080-0066	0	0	0	0	0	0	0	0
County	OTERO								
TOTALS				39	28	872	1	8	2
Line and Column Summaries									

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

[illegible]

Other Captures (Specify)	Non-Target Animal Deaths					Summary of Ruptures	Success of Collar Use		
	Species		Species		All Causes				
	Dead	No. Suspect To 1080	Dead	No. Suspect To 1080			Predation Ceased/ Due to Collar Use	Predation Reduced/ Due to Collar Use	Other Method Solved Predation
	-	-	-	-	1	YES			
	-	-	-	-					
	-	-	-	-	1	yes			
	-	-	-	-	1	yes			
	-	-	-	-	1		✓		
-	-	-	-	-	2		✓		
					5 3				

DID NOT
USE ETC
1990