

112701
SHAUGHNESSEY NO.

11
REVIEW NO.

EEB BRANCH REVIEW

DATE: IN 7/23/81 OUT 8/11/81

FILE OR REG. NO. 10182-UI

PETITION OR EXP. PERMIT NO.

DATE OF SUBMISSION 6/81

DATE RECEIVED BY HED 7/22/81

RD REQUESTED COMPLETION DATE 9/2/81

EEB ESTIMATED COMPLETION DATE

RD ACTION CODE/TYPE OF REVIEW 170/01d Chemical -- Me-Too

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

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Talon WeatherBlocs

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE Proposed conditional Registration of uses in
sewers and in and around buildings and transport Vehicles

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
112701	Brodifacoum	0.005

Brodifacoum (EPA Reg. No. 10182-UI)
(Talon Weatherbloks™)

100 Pesticide Label Information

100.1 Pesticide Use

Talon Weatherbloks, hereafter referred to as Bloks, is a rodenticide product for use against Norway rats, and house mice. The use pattern is delineated under Sec 100.3.

100.2 Formulation Information

Bloks are a paraffined bait block with [REDACTED]
[REDACTED] 0.005% Brodifacoum toxicant.

100.3 Application Methods, Directions, Rates (From proposed label)

For control of Norway rats, and house mice in and around homes, industrial and commercial buildings, and inside transport vehicles and related port or terminal buildings. Treated bait must be placed in tamperproof bait boxes or in location not accessible to children, pets, domestic animals or wildlife such as in burrows which are then closed. For sewer use, hang WEATHERBLOKS on a string or wire or place on a tethered floating platform in bait stations.

Norway Rat

Apply 1/2 to 1 1/2 WEATHERBLOKS (usually at intervals of 15-30 ft) per placement. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease. When infestations of Norway rats are limited to overhead areas, tie or fasten WEATHERBLOKS securely in protected locations on fences, poles, beams or other overhead areas where signs indicate rodents are active.

House Mice

Apply 1 mouse wedge (each 1/12 of a WEATHERBLOK) at intervals of 8-12 feet placement. Larger placements (2 wedges) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity ceases.

100.4 Target Organisms

Norway Rats (Rattus norvegicus)
House Mice (Mus musculus)

100.5 Precautionary Labeling

This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

101 Physical and Chemical Properties

See previous reviews of:

- (1) Turner 4/26/79
- (2) Turner 9/5/78
- (3) Balcomb 4/4/78

102. Behavior in the Environment

No data available

103. Toxicological Properties

See Reviews of

- (1) Tice 11/17/80
- (2) Balcomb 11/16/79
- (3) Turner 4/26/79

104. Hazard Assessment

104.1 Hazard Assessment

The registrant has been informed through previous reviews and/or meetings that Brodifacoum poses primary and secondary hazards to non-targets, including potential impact to endangered species. We, therefore, do not feel a need at this time to re-iterate them.

107. Conclusions

107.1 Discussion

This product, like Talon®, poses a secondary hazard potential. There is also a primary hazard to non-targets that may feed on the product.

107.2 Labeling

The use directions for Talon Weatherbloks™ is not clearly written. The following examples indicate some of the problems associated with working:

(1) "Sewers"- are they storm or runoff water sewers?
Are they sanitary sewers only? Is this word
interpreted to include all types of sewers?

(2) Under Norway Rats -

"When infestations of Norway rats are limited to overhead areas, tie or fasten WEATHERBLOKS securely in protected locations on fences, poles, beams, or other overhead areas where signs indicate rodents are active."

We feel that the word "fences" is not commonly used as per the context of this statement. A fence is a barrier and usually interpreted as a structure by which animals are held within a particular area. Likewise a rat guard on a mooring rope of a ship could be a "fence." We suggest that the word "fences" be deleted.

107.3 Data Request

Since this product poses the same secondary hazards that Talon® has associated with it, we would like to review the requested data for Talon® before we possibly request more data.

107.4 Rebuttal Presumption Against Registration (RPAR)

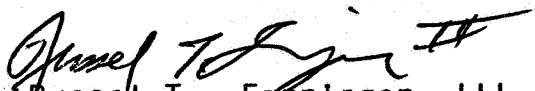
We alert the registrant to the following regulations.

Paragraph 162.11, (2)(6)(i) of regulations for enforcement of FIFRA as Amended states as grounds for issuance of intent to cancel registration: "that, based on toxicological data, epidemiological studies, use history accident data, monitoring data, or such other evidence as is available to the Administrator, the pesticide poses a substantial question of safety to man and the environment." Section 26) of FIFRA States "The term 'environment' includes water, air, land and all plants and man and other animals living therein, and interrelationships which exist among these." Section 2(d) of FIFRA states "the term 'animal' means all vertebrate and invertebrate species, including but not limited to man and other mammals, birds, fish and shell fish.

A substantial question of safety to non-target species (i.e, birds, mammals and possibly fish) has been raised by the proposed registered uses of Brodifacoum (i.e. Talon, Volak, ect.). We have requested data, the results of which could alleviate our concerns for RPAR and prompt registration of the product.

107.5 Conclusions

EEB recommends against the registration of this product (Talon Weatherbloks™ EPA Reg # 10182-UI). We feel that this product will have very similar potentially adverse impacts on the environment that Talon has and require the same testing. A more definitive and complete hazard assessment in the use of Brodifacoum can be made upon receipt and review of requested data and the two previously issued EUP's.


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Date: 8/14/81

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