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EE BRANCH REVIEW

DATE: IN 4-25-80 OUT 5-15-80

FILE OR REG. NO. 10182-UG 10182-UU

PETITION OR (EXP. PERMIT NO.) _____

DATE DIV. RECEIVED 4-24-80

DATE OF SUBMISSION 4-3-80

DATE SUBMISSION ACCEPTED _____

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

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. 16

PRODUCT NAME(S) Talon G

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE Registration of two formulated products for outdoor
use in urban situations.

CHEMICAL & FORMULATION Brodifacoum 0.005%

Inerts 99.995%

Brodifacoum

100.0 Pesticide Label Information

Talon™ pelleted bait is formulated as a 0.005% Rodenticide. It has been registered for indoor use only. This submission deals with the following formulations for outdoor use:

1. 10182-UG Talon™G Rodenticide Pellets
2. 10182-UU Talon™G Rodenticide Bait Pack (Pellets)

100.1 Application Methods/Rates/Direction

Similarities in the two labels are as follows:

1. For use in and around the periphery of public, commercial, industrial and residential buildings located in urban areas. May also be used in alleys and sewers located in urban areas.
2. For use only by or under the supervision of public health officials, Government Vector Control and Commercial Pest Control Personnel(sic).
3. Do not bait within one mile radius of nesting sites being used for re-establishment of raptors. Consult State Wildlife officials to determine locations of such nesting sites.
4. Treated baits must be placed in tamper-proof bait boxes or in locations not accessible to children, pets, domestic animals or wildlife. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.
5. Selection of treatment areas. After removing as much food, water, and harborage as possible determine areas where rats or mice will most likely find and consume the bait. Generally, these areas are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floor and walls or in locations where rodents or their sign have been observed.

Application Directions:

6. For Talon™G Rodenticide Pellets: Apply 4 to 16 ounces of bait (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

7. For Talon™G Rodenticide Bait Pact (Pellets): Apply 2 to 8 packs (usually at intervals of 10 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.
8. Both labels: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and unconsumed bait properly. Repeat treatment when infestation recurs. Where continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

100.4 Target Organisms

Label states "for urban rat control" and has been assumed to mean commensal rats (i.e. Norway and Roof rats).

100.5 Precautionary Label (both labels)

1. Hazards to human and domestic animals
2. Environmental Hazard

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

Sections 101 to and including 103.5.6 see previous reviews dated September 5, 1978; April 26, 1979; April 30, 1979; November 16, 1979.

104 Hazard Assessment

104.1 Discussion

Based on the previous cited reviews and the toxicological properties of this rodenticide, several problems still exist with the proposed outdoor use.

Factors considered:

1. Secondarily toxic to raptors and possibly other scavenging birds.
2. Primary toxicity to squirrels and mice.
3. Secondary toxicity to mammalian species (LD₅₀ as low as 0.25 mg/kg) where scavenging could occur by domestic dogs, possible hazard to skunks, raccoons and opossums, and other carnivores.

104.2 Endangered Species Consideration

It is not expected that the proposed use will adversely affect endangered species. This opinion is based on the distribution and habits of endangered species and the exposure potential that centers around human structures and habitations in urban environments. Endangered terrestrial species that could be affected are unlikely to exist so close to civilization as to be exposed enough for adverse effects to occur.

107 Conclusions

107.1 Classification Labeling

ICI Americas Inc. appears to realize that there are insufficient data at present to fulfill the hazard assessment requirement for outdoor use (e.g. secondary hazard question). Since this is an outdoor use pattern, EEB feels that the label should be classified as restricted until all requirements are met in relationship to secondary hazard.

107.2 Environmental Hazards Labeling

Ecological Effects Branch requests that the environmental hazard section of the label be expanded as follows:

"This product is toxic to fish and wildlife. Use with caution in areas frequented by wildlife. Raptors, predators and domestic animals that eat rodents may be killed by feeding on poisoned rodents. Keep out of lakes, ponds, or streams. Do not use this product in public parks."

107.3 Special Notes

(Referring to Section 100.1)

Additions to label

- Item #1 Additional sentence: Where these areas are not in public parks.
- Item #2 For use only by or under the supervision of certified public health.... Change spelling of "person~~nel~~" to ~~correct~~ spelling "personnel."
- Item #3 Do not bait within one mile radius of nesting sites being used by raptors. (Deletes "for re-establishment of) Consult State Wildlife officials, local bird experts and U.S. Fish and Wildlife Service personnel to determine locations of such nesting sites.

Item #5 First either the phrase on the label, "For urban rat control" will have to be changed to rats and mice or the two words "or mice" will have to be deleted in the selection of treatment areas section.

Item #7 How much bait is in a pack? ^{Signs} What is the pack made out of?

Item #8 The sentence: Collection of and disposal of rats should indicate proper disposal techniques.

107.7

Recommendations

EE Branch concurs with the registration of Talon G for urban rat control providing the registrant agrees to the label changes as indicated in 107.2 and 107.3 of this review and agrees to the restricted use classification. This restricted use classification could be removed at a later date, depending on the results of secondary poisoning studies and any other new support data.

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