

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: October 19, 1978

SUBJECT: EPA Registration No. 10182-EA, (Rodenticide Pellets) and 10182-ER  
(Rodenticide Bait Pack) Caswell No. 114AAA

FROM: John Doherty  
Toxicology Branch *John Doherty*

TO: William Miller  
Product Manager

Registration is being sought to use products containing 0.005% Brodifacoum for control of rats and mice. A general use (unrestricted), classification is being requested.

Recommendation:

Registration is toxicologically supported subject to the remarks as follows. In particular when signed Toxicology reports are received by EPA.

Remarks

- 1). The content of the active ingredient (Brodifacoum, 0.005% or 50 ppm) is very small but the product is still an effective rodenticide because of its apparent accumulative effect in the rodent.
- 2). This pesticide was reviewed recently by J. Doherty (see memo to W. Miller, dated Sept. 12, 1978 concerning 10108-EUP-11) and it was noticed that many Toxicology reports are unsigned and are invalid until signed. These reports concern the technical and formulated products.

Therefore, before these products can be approved for registration, signed reports supporting the Toxicology studies must be submitted.

- 3). Sufficient data (although the reports are unsigned) are available to support a CAUTION labelling. However, the oral toxicity of these products is accumulative.

A special case of hazardous toxicity may be pertinent to these products. For example, children or adults not familiar with the English language may mistake the contents for edible cereal. The inclusion of the skull and crossbones on the label is recommended, but cannot be required because other products currently in use were not similarly labelled by EPA.

RD initial RE:10/11/78:lf

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*10/20/78*