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MEMORANDUM

11/8/85

Subject: Special Review Status based on Adverse Effects Data

To: Norm Cook
Section Head, Section 2

From: Daniel Rieder
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Three studies were submitted for review by ICI America's. These studies were designed to measure effects of Brodifacoum on non-target terrestrial organisms when used around farms in the United Kingdom.

Study 1

Title: Hazard to Non-Target Animals From Use of 'Klerat' Bait on Farms in the UK for Control of the Common Rat Rattus norvegicus.

Results: Use of bait caused primary (direct ingestion) mortality and secondary (predation on primary consumers) mortality on farms where Klerat, containing 50% Brodifacoum, was used. Treatment included fields.

Category: Supplemental

Study 2

Title: Hazard to Non-Target Animals from 'Pulsed' baiting with 'Klerat' Pelleted Bait around Farm Buildings.

Results: Numerous small birds, magpies, pheasants, chickens, rabbits, and a grey squirrel were killed by Brodifacoum due to primary poisoning. Secondary toxicity apparently did not occur. Treatment was primarily around buildings.

Category: Supplemental

Study 3

Title: Hazard to Non-Target Animals From 'Pulsed' Baiting with Wax Block Baits around Farm Buildings.

Results: Both primary and secondary poisoning occurred. However, carcass searches mostly resulted in finds of animals which had experienced primary poisoning.

Category: Supplemental

Special Review Status

These studies support EEB's contention that Brodifacoum should be submitted for Special Review, not only for it's proposed orchard use, but also its use in and around agriculture buildings.

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