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10182-340

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Mr. S. K. Theodorakis
Zeneca Inc.
Zeneca Ag Products
1800 Concord Pike
Wilmington, DE 19897

Dear Mr. Theodorakis:

Subject: Havoc Rodenticide Bait Pack Pellets with Bitrex
EPA Registration No. 10182-340
Your Application for Pesticide Amendment
Dated October 22, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Remove the statement you propose to add that reads:

"A single bait pack (50 Grams) may be consumed by 1-3 rats."

This statement, though perhaps generally true, does not address the bottom-line issue of how many rats are going to die as a result of their having fed on the bait. How many rats die depends not only on how much bait is present but also on how it is distributed among rats. One rat could hog the whole thing. Adult Norway rats eat and spoil approximately an ounce of food a day, and rats exposed to Brodifacoum usually feed relatively normally for several days after the onset of exposure. If carefully divided among rats, 50 g of bait could kill several rats, but we have little assurance that such "fair sharing" would be the usual case. Providing 100 g of bait in two packs might improve the odds against one rat taking all of the bait, especially if the packs were separated.

A statement which would be acceptable (but which might also be limited to the two-pack situation) is

"Two placepacks contain enough bait (100 g) to kill one to three rats."

2. Submit one copy of your final printed labeling before you release the product for shipment.

Madden Disk # 4 12/20/93

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (7505C)

enclosure

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

2-17-93

DEC 21 1993

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
10182-340

SELECTION OF TREATMENT AREAS: Determine areas where rats and/or mice will most likely find and consume the bait. Generally, these areas are along walls, by grained openings in or beside burrows in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed. Remove as much food as possible.

APPLICATION DIRECTIONS
Norway and Roof Rats: Apply 2 to 8 bait packs (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. **A SINGLE BAIT PACK (50 GRAMS) MAY BE CONSUMED BY 1-3 RATS. House Mice:** Open pack and apply 4 to 7 ounce of bait per placement. Space placements at intervals of 8 to 12 feet. Larger placements (up to 2 ounces) 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 cease. **Rats and Mice:** Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and unconsumed bait according to "Disposal" paragraph. To prevent reinfestation, eliminate food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal. Do not reuse empty container except for holding additional HAVOC rodenticide.
STORAGE: Store in original container only in a dry place inaccessible to children and pets.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Dispose of bait container in a sanitary landfill or by incineration if allowed by State and local authorities. Wrap empty or used bait packs in newspapers and discard in trash.

NOTICE TO BUYER AND USER: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions or under conditions not reasonably foreseeable to Seller and Buyer and User assume the risk of any such use. **SELLER DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE.**
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HAVOC

RODENTICIDE BAIT PACK (PELLETS)



KILLS RATS & MICE 3/16" Pellets

Kills warfarin-resistant Norway rats and house mice. Rodents may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENT: Brodifacoum - 3-[3-(4'-bromo-[1,1'-biphenyl]-4-yl)- 1,2,3,4-tetrahydro-1-naphthalenyl]-4- hydroxy-2H-1-benzopyran-2-one	0.005%
INERT INGREDIENTS	99.995%
TOTAL	100.000%

EPA Reg. No. 10182-340
EPA Est. No. 61282-W-1

**Keep Out of Reach Of Children
CAUTION**

Read Additional Precautionary Statements on Back Panel

Net Contents: 50 g (1.76 oz)

Made in U.S.A.



Professional Products

ICI Americas Inc.
Wilmington, D. aware 19897



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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS**

CAUTION
MAY BE HARMFUL OR FATAL IF SWALLOWED. KEEP AWAY FROM HUMANS, DOMESTIC ANIMALS AND PETS. WASH HANDS AFTER HANDLING BAIT.
IF BAIT IS EATEN BY HUMANS, CALL A PHYSICIAN AT ONCE.
IF BAIT IS EATEN BY ANIMALS OR PETS, CALL A VETERINARIAN AT ONCE.

For 24-hour emergency assistance call your local Poison Control Center.

NOTE TO PHYSICIAN OR VETERINARIAN
This product may reduce the clotting ability of the blood and cause hemorrhaging. If poisoning occurs, intramuscular and oral administration of vitamin K₁ are indicated as in poisoning from overdose of bishydroxy coumamm. For human cases, vitamin K₁ is antidotal at doses of 10-20 mg (mg/kg). For animal cases, vitamin K₁ is antidotal at 2-5 mg/kg. Repeated doses may need to be given up to two weeks (based on monitoring of prothrombin times). In severe cases, blood transfusions may be necessary.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and wildlife. This product can pose a secondary hazard to birds of prey and mammals. Keep out of any body of water.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **READ THIS LABEL:** Read this entire label and follow all use directions and use precautions. **IMPORTANT:** Do not expose children, pets, or other nontarget animals to rodenticides to help to prevent accidents.

1. Store product not in use in a location out of reach of children or pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or other wise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears or other potentially destructive animals or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled and unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural and public buildings and similar manmade structures. This product may also be used in and around transport vehicles (ships, trains, aircraft) and related port or terminal buildings. Do not use in sewers. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

BEST AVAILABLE COPY