13808-7

1/17/2005

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance:

JAN 17 2006

NOTICE OF PESTICIDE:

Registration
X Reregistration

Term of Issuance:

13808-7

Reregistration

Name of Pesticide Product:

SODIUM FLUOROACETATE (COMPOUND 1080) LIVESTOCK PROTECTION COLLAR

Name and Address of Registrant (include ZIP Code):

Mr. Kevin Fridley, Director Division of Agricultural Sciences South Dakota Department of Agriculture 523 East Capitol Ave., Foss Building Pierre, SD 57501-3182

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to its EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration and reregistration are in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Reregistration Eligibility Document and subsequent correspondence, EPA has reregistered the product listed above. This action is taken under the authority of section 4(g)(2)(C) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of this product.

Continued on page 2

Signature of Approving Official:

Date:

JAN 17 2006

The Confidential Statement of Formula (CSF) dated "10/15/05" is accepted and replaces all CSFs previously accepted for this product. As indicated in a telephone conversation of October 5, 2005, between Bill Jacobs of my staff and Brad Berven of yours, the CSF dated "9/1/2005" is not acceptable.

The text on the proposed revised container label is acceptable. When final printed labels are prepared, the words "DANGER", "POISON", and "RESTRICTED USE PESTICIDE" must be in at least 18-point type if the area of the label's central panel exceeds 30 square inches. If the area of the center panel is 15-30 square inches, that text must be in at least 14-point type. On a center panel of at least 30 square inches, the phrase "KEEP OUT OF REACH OF CHILDREN" must be in at least 12-point type. On a 15-30 square-inch label, that phrase must be in at least 10-point type. The copy of the container label that appears in the technical bulletin also should conform to these specifications for type size.

The proposed revised technical bulletin is basically acceptable but must be modified as indicated below.

- 1. In the eighth "DO" (which deals with disposal), change the cross reference to read "(see pages 8-9 and 14-15)". We are sorry for having erred on that change in a previous letter.
- 2. In the last sentence of the "General Comments" paragraph on page 10 (section "I.E.1"), change "specialties" to "specialists".

The labeling for the individual collar pictured in your submission of May 19, 2005, is acceptable.

Stamp copies of the accepted labels and the bulletin are enclosed for your records. Submit two (2) copies of each element of final printed labeling (collar label, container label, and technical bulletin) before releasing this product for distribution or sale. After the changes to the technical bulletin have been made, check to make sure that all cross-references remain accurate.

If you do not comply with the conditions indicated in this notice, this 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.

If you have any questions about this letter you may reach Dr. William W. Jacobs by telephone (703-305-6406), by FAX (703-305-6596), or by e-mail (jacobs.bill@epa.gov).

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Sincerely.

Meredith Laws, Chief

Insecticide-Rodenticide Branch

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Registration Division (7505C)



DIRECTIONS FOR USE

It is a violation of State and Federal laws to use this product in a manner inconsistent with its labeling or the Compound 1080 cancellation order. Misuse may result in a civil or criminal enforcement action.

DO NOT REMOVE TOXICANT FROM COLLARS. DO NOT USE TORN, DAMAGED OR LEAKING COLLARS. Dispose of damaged collars in accordance with the "Storage and Disposal" instructions on this label.

Put collars on the necks of sheep or goats in fenced pastures where coyote predation is occurring or is expected to occur. Use collars only in accordance with the User Instructions and Use Restrictions contained in the accompanying Technical Bulletin.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store Livestock Protection Collars only in original container, in a dry, locked place away from food, feed, domestic animals and corrosive chemicals. Do not store in any structure occupied by humans.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of such materials is a violation of Federal Law.

Dispose of Westes contaminated by 1080 (carcasses, wool, hair, vegetation, soil, leather clothing, and water) under three feet of soil at a safe location, preferably on property owned or managed by the applicator and at least one half mile from human habitations and water supplies.

When snow or frozen ground make on-site disposal impractical, up to one cubic foot of wastes may be stored in a leak-proof container, in a dry locked, place for up to 90 days.

Alternatively, contact your state pesticide Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidence in disposing of wastes at approved hazardous waste disposal facilities.

COLLAR DISPOSAL: Damaged irreparable and/or leaking collars must be disposed of by deep burial. Follow the procedures described above and in Use Restriction 13 in the Technical Bulletin.

CONTAINER DISPOSAL: Metal and plastic containers – Triple rinse contaminated and uncontaminated containers with water. Then puncture and dispose of contaminated containers and rinsate as above.

RESTRICTED USE PESTICIDE

Due to A. Dral Toxicity and the Need for Highly Specialized Applicato. ..ing. Collars shall be sold or transferred only by registrants or their agents and only to certified Livestock Protection Collar applicators. Collars may be used only by specifically certified Livestock Protection Collar applicators.

FOR USE ONLY IN THE STATE OF SOUTH DAKOTA SODIUM FLUORACETATE (COMPOUND 1080) LIVESTOCK PROTECTION COLLAR

For use on sheep or goats to kill depredating coyotes

ACTIVE INGREDIENTS - SODIUM FLUORACETATE 1.00% INERT INGREDIENTS 99.00% TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER



POISON

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting at once with an emetic such as syrup of ipecac; use as directed. If emetic is not available, drink 1-2 glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. PROMPT TREATMENT IS MANDATORY. GET MEDICAL ATTENTION IMMEDIATELY.

IF ON SKIN: Wash the exposed area twice with soap and water.

IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON CLOTHING: Remove contaminated clothing and wash before reuse. Dispose of all contaminated leather, including shoes, boots, and gloves, according to the "Pesticide Disposal" section. See disposal instruction on the side panel.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

MANUFACTURED FOR: South Dakota Department of Agriculture, Pierre, SD 57501

U.S. PAT. 3,842,806

EPA ESTABLISHMENT NO: EPA REGISTRATION NO:

13808-SD-1 13808-7

NET CONTENTS: 30.4 grams (1.1 oz.) per small collar

NOTICE

Seller makes no warranty, expressed or implied, concerning the use of this product other than as indicated on the label. Buyer assumes all fisks of use and/or handling of the product when such use and/or handling is confact, to label instructions.



HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Fatal if swallowed. Wear waterproof gloves when handling collars. Wash hands after handling collars or animals that have been contaminated with 1080 solution. Do not use contaminated animals for food or feed.

ENVINRONMENTAL HAZARDS

This product is highly toxic to wildlife. Birds and mammals feeding on carcasses of contaminated livestock may be killed. Apply this product only as specified on this label. Keep out of any body of water.

ENDANGERED SPECIES CONSIDERATIONS

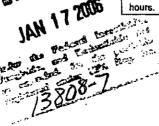
NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of a member of an endangered species.

The use of 1080 in the Livestock Protection Collar has been determined to pose a hazard to several endangered species. See technical bulletin (restriction No. 15) for specific areas where the 1080 collar cannot be used without specific approval from the U.S. Fish and Wildlife Service.

INFORMATION FOR PHYSICIANS

WARNING SYMPTOMS: 1080 poisoning results from the transformation of fluoracetate into flourocitrate within cell mitochondria. Poisoning is normally characterized by a symptom-free latent period of ½ to 2 hours or longer between ingestion and onset of symptoms (nausea, vomiting, diarrhea, and hyperactive behavior leading to convulsions, coma and cyanosis). Ventricular fibrillation is commonly noted and is the primary cause of death. Early symptoms include alteration of heart sounds and premature, weak cardiac contractions.

TREATMENT: No effective antidote is known, but symptomatic treatment may be effective. Establish respiration; create artificial alirway if necessary. Check adequacy of tidal volume. Initiate emesis. If patient is comatose, convulsing, or has lost the gag reflex, endotracheal intubation should precede gastric lavage with large bore tube. Administer activated charcoal and magnesium sulfate. Treat selzures with IV diazepam. Monitor cardiac function closely. Treatment with glyceryl monoacetate (mmonoacetin) may be effective; however, it is experimental and unproven in humans. CONSULT NEAREST POISON CONTROL CENTER FOR CURRENT INFORMATION. Symptoms of non-lethal intoxication will usually subside within 12-24 hours.





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TECHNICAL BULLETIN

FOR APPLICATOR USE OF THE

LIVESTOCK PROTECTION COL



SOUTH DAKOTA DEPARTMENT OF AGRICULTURE

AGRICULTURAL SERVICES DIVISION

PIERRE, SOUTH DAKOTA 57501

TECHNICAL BULLETIN FOR LIVESTOCK PROTECTION COLLAR

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DO'S AND DONT'S FOR LIVESTOCK PROTECTION COLLARS

DO

- Read the label and Technical Bulletin before using collars
- Plan how to target coyotes to your collared animals before using collars
- Be sure to position collars correctly (see pages 6-7)
- Check and repair fences if necessary before putting collared animals in pasture
- Notify neighbors that collars can be hazardous to free-ranging pets
- Keep warning signs in place as long as collars are being used (see page 14)
- Check collared animals weekly or more often to be sure that all are present and that
 collars are in position and not punctured (see pages 7-8 and 14-15)
- Properly dispose of all collars, animals, vegetation, soil, water, leather, clothing, and containers contaminated by 1080 (see pages 7-8 and 14-15)
- Report any suspected poisoning of non-target animals or humans (see pages 8, 13)
- Minimize human activity in pastures where collars are being used
- Keep records up to date as directed in the labeling (see page 13)
- Take collars off when predation has stopped or is not expected to occur
- Store collars properly when not in use (see pages 14-15)
- Wear water-proof gloves when handling collars
- Wash your hands with soap and water after handling collars

DON'T

- Waste time by placing collared animals where coyotes won't attack them
- Use collars if your livestock can be protected more easily or economically by other measures
- Use so few collared animals that coyotes won't find them
- Use more them 20 collars in any 100-acre or smaller pasture, or more than 50 collars per section (640 acres) of pasture (see page 15)
- Use collars on unfenced, open range (see pages 13-14)
- Use collars where their use is prohibited to protect endangered wildlife (see page 15)
- Use contaminated animals for food or feed (see page 15)
- Use leaking or damaged collars
- Remove toxicant from collars

A. INTRODUCTION AND THEORY

The livestock Protection Collar, invented by Roy McBride of Alpine, Texas, exploits the coyote's habit of killing sheep and goats by bites to the throat (photo 1). As described in McBride's U.S. Patent No. 3,842,806 (issued in 1974), coyotes that attack collared livestock usually bite through the collars and receive oral doses of the contents. When used with a toxicant such as sodium fluoroacetate (Compound 1080), Livestock Protection Collars kill the attacking coyotes. Collars may be used only by specifically certified Livestock Protection Collar applicators (see Section II. 2). This publication is intended for the instruction of collar applicators.

Coyote's attacking and feeding behaviors do not seem to be affected by the presence of Livestock Protection Collars. Attacking coyotes usually kill and feed upon collared animals just as they would if no collar were present. After a lethal dose of sodium fluoroacetate (Compound 1080) has been ingested, symptoms of intoxication typically do not appear for 2 or more hours. Death occurs from 2 to 7 hours (average 4 hr and 20 min) after the collar is punctured.

When collars are used properly, coyotes may puncture them in 75 percent or more of their attacks. A 100 percent puncture rate is unlikely to be achieved because coyotes sometimes attack body sites other than the throat (photo 2).

Effective use of Livestock Protection Collars requires not only that collars are positioned correctly, but also that coyote attacks be directed or targeted to collared livestock. Targeting may be difficult or impossible under some conditions. If coyotes are killing less than once per week, the collar techniques may be impractical. Collars are recommended for ranches with high rates of coyote predation and management conditions that permit effective targeting of predation to collared livestock.

Experienced persons usually can evaluate local conditions quickly to decide whether or not collars will be effective. In addition to the basic problem of targeting, other factors to consider in deciding whether or not to use collars include availability and effectiveness of other control methods; costs of collars; labor requirements to collar and monitor livestock; potential hazards of collars to humans, domestic animals including pets, and non-target wildlife; and severity of predation.

B. TOXIC PROPERITIES OF SODIUM FLUORACETATE (COMPOUND 1080)

Compound 1080 is highly toxic to warm blooded animals, including man, when taken internally. Humans are not likely to be poisoned except by ingestion of collar contents. Based on available estimates of toxicity (0.7-2.1 mg/kg) a lethal dose for a 150-pound man would be contained in 5 to 14 ml of collar solution.

One collar (contents 30 ml) contains 2 to 6 lethal doses. Before using collars, <u>read the label</u> (Appendix A) and the Use Restrictions in the Technical Bulletin (Section II) carefully.

The toxic solution in Livestock Protection Collars contains yellow dye (Tartrazine) as a safety marker. Punctured, damaged, or broken collars together with clothing, animal remains, vegetation, soil, and other materials marked by this dye must be cleaned or disposed of in accordance with the label and Section 1. D. 5 and II. 13 of this Technical Bulletin. Collars with minor damage to straps or fastenings may be repaired by applicators as long as the toxicant reservoirs have not been punctured and do not leak.

Compound 1080 is hazardous to domestic animals including livestock and pets. Dogs are particularly susceptible. In field studies, dogs have died after they attacked collared livestock and punctured the collars. As little as 0.1 ml of collar contents may be fatal to a 25 pound dog. Dogs could be poisoned by scavenging the carcasses of collared livestock. Therefore, to minimize the potential hazard to dogs, promptly dispose of all livestock carcasses as well as coyote carcasses suspected of being poisoned by Compound 1080 according to instruction in this bulletin.

Pen studies have shown that an adult sheep can be fatally poisoned by eating forage containing as little as 1 ml of 1080 solution from Livestock Protection Collars. Although no livestock appeared to have been poisoned by eating contaminated vegetation during 5 years of field testing, it could happen. Therefore, contaminated forage must be disposed of as directed on the product labeling.

C. DESCRIPTION OF COLLARS

The Livestock Protection Collar is a rubber bladder that contains a solution of Compound 1080, with neck straps for attachment to a sheep or goat. The type of collar used most up to 1990 has two Velcro neck straps (0.75 inches wide and 22-24 inches long on new collars). The Livestock Protection Collars have two toxicant reservoirs. The collar is intended for use on lambs and kids weighing from 25 to 50 pounds. Livestock Protection collars are not recommended for small animals (under 25 pounds). The collar may be used on large lambs and kids, and on adult sheep and goats.

D. MANAGEMENT OF COLLARS ON SHEEP AND GOATS

- 1. Things to do before putting collars on livestock;
 - a. Be sure you have enough collars.
 - b. Inspect all collars for leaks and inspect straps to be sure they are securely attached. Do not use leaking or torn collars (photo 7) or collars on which the straps are coming loose (photo 8). Loose straps may be reattached by sewing.

- c. Check the fence around the pasture where collared animals are to be placed and repair as necessary to keep animals within the pasture.
- d. Establish locations for warning signs (page 14), and be sure you have enough signs.
- e. Inform neighbors of your intent to use Livestock Protection Collars and advise them of the potential hazards to free-roaming dogs.
- f. If ear tags or other marks are to be used, have the tags and related equipment on hand.
- g. Have an emetic (1-ounce bottle of syrup of ipecac) available when collars are to be handled. Also have a few good quality plastic bags or other leak-proof containers on hand for packaging damaged collars.
- h. Select and pen the target flock (animals to be collared).

2. Attaching collars

Hold collars up to the necks of target livestock to determine that they will fit each animal (photo 9). The rubber portion of the collar should come up to the ear (photo 4). If the collar is too small, there will be an unprotected region below each ear (photo 10). This will result in a lower puncture rate than would be obtained with collars that fit properly.

One person can put collars on livestock, but the task is much easier for a two-person team. One person holds each animal while the other attaches its collar. To attach a collar, hold it in position under the animal's neck just behind the ears and fasten it securely. Straps should be positioned to keep the rubber part of the collar directly below the ear (photos 4, 5, 6). On goats with horns, the front strap may pass in front of both horns or in front of one horn and behind the other. If necessary, using string or twine to tie the front strap to one or both horn to keep the collar in position (photo 11). Once the front strap is in position, re-adjust the rear strap if necessary and then secure it. If the straps are longer then needed, a knife or scissors can be used to trim off the excess. Fasten the strap ends by stapling (photo 12).

Collar straps must be tight enough to prevent collars from slipping out of position (photo 13), but not so tight as to choke the animal or cause sores (photo 14). Each strap should be loose enough that the applicator can insert two fingers between the strap and the animal. Collars stay in place well on animals with wool or mohair, but may be difficult to keep in position on newly shorn or slick-necked animals, particularly goats (photo 11). Head and neck conformation varies among animals and it may be impossible to keep collars in place on some individuals. They should be taken out of the collared flock.

A suitable method of permanently identifying individual animals in a target flock is required to keep track of collared livestock. One such method is the use of numbered ear tags. Tags that can be read from a distance of 50 feet or more are most useful (photo 15). If you are using ear tags, attach them before the animal is collared.

When the collar is in place, release the animal into a corral or other confined area and observe it carefully. Listen for labored breathing that may indicate the collar is too tight. When first released, collared sheep and goats often shake their heads, rub or make other attempts to rid themselves of the collars. This behavior will stop within a few hours if collars are not too tight. After you are satisfied that the collars are properly attached, move collared animals to the desired location.

Place warning signs at logical points of access (see Section II. 10).

After handling Livestock Protection Collar, wash your hands with soap and water.

3. Monitoring collared livestock

Once collared animals are in the desired location, the pasture should be checked every 7 days or more often if frequent predation is expected. During each check try to locate each animal and observe collars to be sure they are in position. If the collar has slipped out of position, catch the animal and reposition its collar. Inspect each animal's neck for yellow dye, which would indicate a punctured or leaking collar. If dye is seen, catch the animal and check the collar. Replace any damaged or leaking collar. See the label and Section 1. D. 5 and II. 13 of this Technical Bulletin. Collars on small kids or lambs may require periodic adjustment to allow for growth.

When searching for collared livestock, watch for both animal carcasses and congregations of scavenging birds that could indication the locations of carcasses. Whenever you visit a pasture, record the identity of each collared animal seen. Check each warning sign weekly to ensure that it is in place and is legible.

Based on experience gained in research studies, you will not see each collared animal every time you visit large, brushy pastures. Any animal not accounted for in two consecutive checks may be dead. An intensive search for it must be made. In addition, if more than three collared animals are not accounted for during any one check, an intensive search for these animals is required. Pastures must be systematically searched in their entirety or until the missing animals are located.

If more than <u>nine</u> (9) collars and/or collared animals are unaccounted for during any 60 day period, remove all collars from animals and terminate their use. Seek technical advice if necessary to determine and correct the cause(s) of collar loss. Collar use may be resumed after adequate steps have been taken to prevent further, excessive loss of collars. See Section II. 11.

Routine checks of collared livestock are difficult if the animals are secretive or wild. Feed concentrates can be used to train animals to come to you or your vehicle. This facilitates the identification and inspection of collared livestock (photo 16). It also helps to have a few tame animals in the collared flock. Binoculars may be useful for inspecting collared livestock from a distance.

Infrequently, collars may be missing from carcasses of sheep or goats killed by coyotes. In research studies, missing collars appeared to have been carried or dragged away by coyotes. Some were found as far as half a mile away from the kill sites, but about half of the missing collars were never recovered. Coyotes sometime cache (hide or bury) them. Whenever a collar is missing, make a reasonable effort to find it. See Section II. 11.

If you see an animal that you think may have been poisoned, report it promptly to the appropriate regulatory agency. Any suspected poisoning of threatened or endangered species <u>must be reported immediately</u>. See Section II. 6.

4. Handling collars and contaminated animal remains, vegetation, clothing, water and soil.

The toxic solution in Livestock Protection Collars contains a yellow dye, Tartrazine, which is used as a marker for the presence of 1080 on punctured, damaged, or broken collars; on clothing, animal remains,

vegetation, soil, or other materials; and in water. Always use waterproof gloves when handling collars or any materials known to be contaminated by 1080.

Inspect carcasses of collared animals to determine the cause of death. When the carcasses are fresh (within 24 hours after death), coyote kills usually are obvious (photo 17). Remove punctured collars carefully and examine the punctures. Holes made by coyote teeth usually can be distinguished from accidental punctures. When collars are punctured by cactus thorns, the thorns sometimes remain in the holes (photo 18).

If the collar was punctured, remove it carefully to minimize leakage and place in a leak-proof plastic bag or other container for transport to your disposal site. If necessary, double bag to prevent leakage. Examine the carcass for contamination as indicated by yellow dye. Cut away the contaminated parts for disposal along with the punctured collar. See Section II. 12-13. Dispose of the remainder of the carcass using normal practice. Cut or dig up contaminated forage for transport to the disposal site.

If the collar was not punctured, the applicator can reuse it on another animal. Dispose of carcass using normal practice. No special handling is required. If an unpunctured collar has only minor damage to straps or fasteners, the applicator may repair it.

When predation has stopped, or when collars are to be taken off for other reasons such as shearing, gather the collared flock into a corral. Hold each animal and inspect its collar for punctures. Loosen the neck straps and pull them free. Do not pull so hard that you rupture the collar (photo 7). It may be necessary, particularly with Angora goats, to use a knife or scissors to free collar straps from the animal's hair. Clean un-punctured collars as necessary and return them to locked storage until you need them again.

If clothing becomes contaminated with 1080 solution, remove it promptly. Wash clothes before wearing them again. Contaminated leather clothing, including gloves and footwear, should be disposed of in the same manner as contaminated animal remains because pesticides cannot be easily cleaned from leather.

See Section II. 13.

5. Disposal of damaged collars and other contaminated materials.

Damaged, punctured or leaking collars, contaminated animal remains, vegetation, soil, water, and leather clothing must be properly disposed of. The preferred method is by deep burial under 3 feet of soil in a safe field location at least one-half mile from human habitations and water supplies. For disposal on the ranch, it may be convenient to drill several deep holes

using a mechanized post hole auger, or to make a trench using with a backhoe. Then, as waste materials are produced, they can be dropped into the hole or trench and covered with earth. Not more than 10 collars may be buried in any one hole. If buried in a trench, each group of ten collars must be at least 10 feet apart.

Alternatively, contact the South Dakota Department of Agriculture, Pierre, South Dakota or the South Dakota Department of Water and Natural Resources, Pierre, South Dakota for guidance in disposing of wastes at approved hazardous waste disposal facilities.

When snow or frozen ground make on site disposal impractical, up to one cubic foot of wastes may be stored in a leak-proof container, in a dry, locked place for up to 90 days.

E. Directing Coyote Predation to Collared Livestock

1. General Comments

The process of directing coyote predation to collared livestock is called targeting. Knowledge of targeting is in its infancy and should improve as more people gain experience with Livestock Protection Collars. Three different approaches or targeting strategies are described here. Ranchers and predation control specialties are encouraged to apply these methods as necessary to achieve the best results in their own circumstances.

2. Targeting Strategies

a. Collar all vulnerable livestock

Collaring all sheep or goats on a ranch would solve the targeting problem. This strategy has not been tested due to the cost of collars (\$20.00 each in 1990) and the large number that would be required in large flocks (over 100 animals). Nevertheless, in small flocks (50 or fewer animals) it may be practical to collar all the lambs or kids. In flocks with 50 to 100 lambs or kids, it may be worthwhile to collar the smallest 20 to 50 individuals. Do not use more than 20 collars in any pasture under 100 acres, or more than 50 collars per square mile of fenced pasture.

b. Use target (collared) flocks

When coyotes are killing in particular pastures, remove all vulnerable livestock. Place 20 to 50 collared lambs or kids with their mothers in the pasture while all other vulnerable animals are penned at night or moved elsewhere. Add uncollared adult sheep or goats to the target flock to increase its total size to 50 or 100 head. If coyotes have been killing adult sheep or goats in the area,

both adults and kids in the target flock should be collared. Remove collars 30 days after predation ceases, or whenever the risk of predation has abated.

This was the strategy used in most field tests and is the usual approach when collars are introduced onto a ranch where depredation is in progress. This strategy also can be employed by placing collared flocks in vacant pastures 1 to 2 months before large bands of sheep or goats arrive.

c. Collar vulnerable individuals in large flocks

Coyotes usually prefer kids or lambs to adult goats or sheep. Experience with Angora goats has shown that if a few collared kids are placed in wether flocks (5-10 collared kids per 100 uncollared adults), coyotes will select the kids (photo 20).

This strategy has not been tested on sheep and is not recommended for sheep at this time.

3. Mistakes in Targeting

As with any new technique, one must learn how to use Livestock Protection Collars before optimum results can be expected. Following is a list of some mistakes commonly made by persons learning this technique:

- a. Collars may be placed where effective targeting cannot be expected. In one example, 20 lambs were collared in a ewe-lamb flock containing hundreds of lambs. Coyotes subsequently killed the uncollared lambs. Effective targeting did not occur because collared lambs were far outnumbered by uncollared lambs that were equally attractive to coyotes.
- b. Collars are placed where predation is too infrequent. In one such case, collared sheep were exposed for four weeks during which no predation occurred. The users then lost interest and removed the collars. There was no further predation on this ranch for several months. Collars cannot be used effectively where there is little or no predation.
- c. Target flocks are too small. In one example, six collared lambs were left alone in a one-section pasture. Coyotes passed through the pasture without finding the collared animals and then killed sheep from a large flock in an adjacent pasture. The larger the flock, the more likely it is to attract coyotes. The optimum size for target flocks has not been determined, but pastures of 100 acres or more should probably contain at least 50 head.

- d. Target flocks are not isolated sufficiently from uncollared livestock.

 On one small farm, a group of ewes and collared lambs was exposed while other sheep on the place were penned each night. Instead of killing the collared flock, coyotes switched to a neighbor's unprotected flock half a mile away. With small farm flocks, adjacent land owners may have to work together to achieve effective targeting.
- e. Small collars are used on large sheep or goats, leaving the throat region inadequately covered (photo 10). Coyotes will kill these animals without puncturing the collars.
- f. Collars are attached improperly, or they slip out of position (photo 13). Coyotes will kill these animals but are unlikely to puncture the collars. Collars in proper position are shown in photos 4, 5, 6, 11, and 16.
- g. Collars are placed on sick or cull animals in an effort to avoid sacrificing more valuable livestock. This may be false economy, as coyotes may not attack ill or lethargic animals. Collars should be used only on animals of the size and kind that coyotes have been killing locally.
- h. Use of collars may be accompanied by increased human activity on the ranch. Coyotes often are wary of unusual activity and may temporarily stop killing because of it. Collars should be placed and monitored with a minimum of disruptive activity.

Section II. USE RESTRICTIONS

- 1. Use of collars shall conform to all applicable Federal, State, and local regulations.
- 2. Collars shall be sold or transferred only by registrants or their agents and only to certified Livestock Protection Collar applicators. Collars may be used only by specifically certified Livestock Protection Collar applicators.
 - The certified applicator is directly responsible for assuring that all use restrictions are met. The certified applicator will decide, in accordance with label directions, when and under what circumstances collars will be used.
- 3. Certification of applicators shall be performed by appropriate regulatory agencies. Prior to certification, each applicator shall receive training which will include, but need not be limited to:
 - (a) Training in safe handling and attachment of collars.
 - (b) Training in disposal of punctured or leaking collars, and contaminated animal remains, vegetation, soil, and clothing.

- (c) Instructions for practical treatment of 1080 poisoning in human and domestic animals.
- (d) Instructions on record keeping.
- 4. Registrants or their agents shall keep records of all collars sold or transferred at their address of record. Records shall include the name, address, state where Livestock Protection Collar certification was issued, certification number of each recipient, and dates and number of collars sold or transferred.
- 5. Each applicator shall keep records dealing with the use of Livestock Protection Collars and the results of such use. Records shall be maintained in accordance with appropriate State or Federal regulations, but for not less than two years following disposal or loss of collars. Such records shall include, but need not be limited to:
 - (a) The number of collars attached on livestock.
 - (b) The pasture(s) where collared livestock were placed.
 - (c) The dates of each attachment, inspection, and removal.
 - (d) The number and locations of livestock found with ruptured or punctured collars and the apparent cause of the damage.
 - (e) The number of collars lost or not recovered.
 - (f) The species, locations, and dates of all suspected poisonings of humans, domestic animals, or non-target wild animals resulting from collar use.
- 6. Any suspected poisoning of threatened or endangered species must be reported immediately (within three days) to the South Dakota Department of Agriculture, as well as each suspected poisoning of humans, domestic animals, or non-target wild animals.
- 7. Only the registrant or collar manufacturer is authorized to fill collars with 1080 solution. Certified applicators are not authorized to fill collars. Compound 1080 solution may not be removed from collars and used for any other purpose.
- 8. Collars shall only be used to take coyotes within fenced pastures* no larger than 2,560 acres (4 square miles). But where average annual precipitation does not exceed 20 inches and vegetation is sparse, consisting only of short to mid-height grasses and scattered shrubs, collars may be used in pastures up to a maximum of 10,000 acres (16 square miles) in size.

^{*}Fenced pastures include all grazing land that is enclosed by livestock fencing. This includes wire or other man-made fences such as rock walls, and natural barriers such as escarpments, lakes, and large rivers that will prevent escape of livestock.

In no case shall the applicator place collared livestock in pastures where compliance with other Use Restrictions, such as monitoring, is impossible; in fenced pastures larger than 10,000 acres; or in unfenced, open range.

- 9. Collars shall be used only where losses of sheep or goats due to predation by coyotes are occurring or, based upon prior experience, where coyote predation can reasonably be expected to occur.
- 10. Where collars are in use, each logical point of access (for example, roads, gates, and trails) shall be conspicuously posted with a bilingual (English/Spanish) warning sign not less than 8" X 10" in size. Signs shall be inspected weekly to ensure their continued presence and legibility and will be removed when collars are removed. The signs will have a minimum type size for "DANGER-POISON" of 24 point (1/4 inches), with remaining text at least 18 point (3/16 inches).
- 11. All collared livestock must be checked at least once every seven days and collars adjusted if needed.

If <u>any</u> collared animal is not accounted for in <u>two</u> consecutive checks, an intensive search for it must be made.

In addition, if more than <u>three</u> collared animals are not accounted for during any <u>one</u> check, an intensive search for these animals is required.

If more than <u>nine</u> (9) collars are unaccounted for during any 60 day period, remove all collars from animals and terminate their use. Do not resume use until adequate steps have been taken to prevent further, excessive loss of collars.

- 12. Damaged, punctured, or leaking collars shall be removed from the field for repair or proper disposal. Damaged collars shall be placed individually in leak-proof containers while awaiting repair or proper disposal. Authorized collar repairs are limited to minor repairs of straps and fasteners. Leaking or punctured collars must be properly disposed.
- 13. Dispose of 1080 wastes (punctured, leaking, or otherwise unrepairable collars; contaminated leather clothing, animal remains, wool, hair, vegetation, water, and soil) under three feet of soil, at a safe location, preferably on property owned or managed by the applicator and at least ½ mile from human habitations and water supplies. No more than 10 collars may be buried in any one hole. If buried in a trench, each group of 10 collars must be at least 10 feet apart.

Alternatively, contact the South Dakota Department of Agriculture, Pierre, South Dakota, or the South Dakota Department of Water and Natural Resources, Pierre, South Dakota for guidance in disposing of wastes at approved hazardous disposal facilities.

When snow or frozen ground make on-site disposal impractical, up to one cubic foot of wastes may be stored in a leak-proof container, in a dry, locked place for 90 days. When conditions improve to allow for proper disposal, dispose of stored wastes according to the methods indicated above.

Metal Container: Triple rinse contaminated and uncontaminated containers with water. Puncture and dispose of contaminated container and rinsate as above.

Plastic Container: Triple rinse with water. Then, puncture and dispose of container and rinsate as above.

- 14. All persons authorized to possess and use Livestock Protection Collars shall store them under lock and key in a dry place away from food, feed, domestic animals, and corrosive chemicals in outbuildings, or in outdoor storage areas attached to, but separate from human living quarters.
- 15. Provisions for protection of endangered species:

Do not use the livestock protection collar within one mile of a prairie dog colony where the presence of the black-footed ferret has been confirmed by the US Fish and Wildlife Service within the past 5-year period.

16. The number of collars used shall be the minimum necessary for effective livestock protection. For pastures of the following size classes, do not use more collars than the number indicated.

Size (acres)	Number of Collars
Up to 100	20
101 to 640 ·	50
641 to 10,000*	100
*See Section II.8.	

- 17. Each applicator will have a one-ounce bottle of syrup of ipecac (to induce vomiting in case of accidental poisoning) available when attaching, inspecting, removing, or disposing of collars.
- 18. No contaminated animal will be used for food or feed.

SECTION III.

APPENDICES

DIRECTIONS FOR USE

It is a violation of State and Federal laws to use this product in a manner inconsistent with its labeling or the Compound 1080 cancellation order. Misuse may result in a civil or criminal enforcement action.

DO NOT REMOVE TOXICANT FROM COLLARS. DO NOT USE TORN, DAMAGED OR LEAKING COLLARS. Dispose of damaged collars in accordance with the "Storage and Disposal" instructions on this label.

Put collars on the necks of sheep or goats in fenced pastures where coyote predation is occurring or is expected to occur. Use collars only in accordance with the User instructions and Use Restrictions contained in the accompanying Technical Bulletin.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store Livestock Protection Collars only in original container, in a dry, locked place away from food, feed, domestic animals and corrosive chemicals. Do not store in any structure occupied by humans.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of such materials is a violation of Federal Law.

Dispose of Wastes contaminated by 1080 (carcasses, wool, hair, vegetation, soil, leather clothing, and water) under three feet of soil at a safe location, preferably on property owned or managed by the applicator and at least one half mile from human habitations and water supplies.

When snow or frozen ground make on-site disposal impractical, up to one cubic foot of wastes may be stored in a leak-proof container, in a dry locked, place for up to 90 days.

Alternatively, contact your state pesticide Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance in disposing of wastes at approved hazardous waste disposal facilities.

COLLAR DISPOSAL: Damaged irreparable and/or leaking collars must be disposed of by deep burial. Follow the procedures described above and in Use Restriction 13 in the Technical Bulletin.

CONTAINER DISPOSAL: Metal and plastic containers – Triple rinse contaminated and uncontaminated containers with water. Then puncture and dispose of contaminated containers and rinsate as above.

RESTRICTED USE PESTICIDE

Due to Acute Oral Toxicity and the Need for Highly Specialized Applicator Training. Collars shall be sold or transferred only by registrants or their agents and only to certified Livestock Protection Collar applicators. Collars may be used only by specifically certified Livestock Protection Collar applicators.

FOR USE ONLY IN THE STATE OF SOUTH DAKOTA SODIUM FLUORACETATE (COMPOUND 1080) LIVESTOCK PROTECTION COLLAR

For use on sheep or goats to kill depredating coyotes

ACTIVE INGREDIENTS - SODIUM FLUORACETATE 1.00% INERT INGREDIENTS 99.00% TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER



POISON

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting at once with an emetic such as syrup of ipecac; use as directed. If emetic is not available, drink 1-2 glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. PROMPT TREATMENT IS MANDATORY. GET MEDICAL ATTENTION IMMEDIATELY.

IF ON SKIN: Wash the exposed area twice with scap and water.

IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON CLOTHING: Remove contaminated clothing and wash before reuse. Dispose of all contaminated leather, including shoes, boots, and gloves, according to the "Pesticide Disposal" section. See disposal instruction on the side panel.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

MANUFACTURED FOR: South Dakota Department of Agriculture, Pierre, SD 57501

U.S. PAT. 3,842,806

EPA ESTABLISHMENT NO: EPA REGISTRATION NO:

13808-SD-1 13808-7

NET CONTENTS: 30.4 grams (1.1 oz.) per small collar

NOTICE

Seller makes no warranty, expressed or implied, concerning the use of this product other than as indicated on the label. Buyer assumes all risks of use and/or handling of this product when such use and/or handling is contrary to label instructions.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Fatal if swallowed. Wear waterproof gloves when handling collars. Wash hands after handling collars or animals that have been contaminated with 1080 solution. Do not use contaminated animals for food or feed.

ENVINRONMENTAL HAZARDS

This product is highly toxic to wildlife. Birds and mammals feeding on carcasses of contaminated livestock may be killed. Apply this product only as specified on this label. Keep out of any body of water.

ENDANGERED SPECIES CONSIDERATIONS

NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of a member of an endangered species.

The use of 1080 in the Livestock Protection Collar has been determined to pose a hazard to several endangered species. See technical buffelin (restriction No. 15) for specific areas where the 1080 collar cannot be used without specific approval from the U.S. Fish and Wildlife Service.

INFORMATION FOR PHYSICIANS

WARNING SYMPTOMS: 1080 poisoning results from the transformation of fluoracetate into flourocitrate within cell mitochondria. Poisoning is normally characterized by a symptom-free latent period of ½ to 2 hours or longer between ingestion and onset of symptoms (nausea, vomiting, diarrhea, and hyperactive behavior leading to convulsions, coma and cyanosis). Ventricular fibrillation is commonly noted and is the primary cause of death. Early symptoms include alteration of heart sounds and premature, weak cardiac contractions.

TREATMENT: No effective antidote is known, but symptomatic treatment may be effective. Establish respiration; create artificial alrway if necessary. Check adequacy of tidal volume. Initiate emesis. If patient is comatose, convulsing, or has lost the gag reflex, endotracheal intubation should precede gastric lavage with large bore tube. Administer activated charcoal and magnesium sulfate. Treat seizures with IV diazepam. Monitor cardiac function closely. Treatment with glyceryl monoacetate (mmonoacetin) may be effective; however, it is experimental and unproven in humans. CONSULT NEAREST POISON CONTROL CENTER FOR CURRENT INFORMATION. Symptoms of nonlethal intoxication will usually subside within 12-24 hours.







DANGER - POISON &



TO CONTROL STOCK-KILLING COYOTES, SHEEP OR GOATS IN THIS AREA ARE WEARING NECK COLLARS THAT CONTAIN A POISON, COMPOUND 1080 (SODIUM FLUOROACETATE).

DO NOT TOUCH COLLARED LIVESTOCK, COLLARS, OR DEAD ANIMALS. DO NOT RELEASE LIVESTOCK.



\$ PELIGRO - VENENO \$



PARA CONTROLAR COYOTES QUE ATACAN AL GANADO, ALGUNAS OVEJAS O CABRAS EN ESTA AREA LLEVAN COLLARES QUE **CONTIENEN UN VENENO, COMPUESTO 1080** (FLUROACETATO DE SODIO).

NO TOQUE LOS ANIMALES, LOS **COLLARES, NI LOS ANIMALES MUERTOS. NO SUELTE A LAS** OVEJAS O CABRAS.

Appendix C

PHOTO CAPTIONS

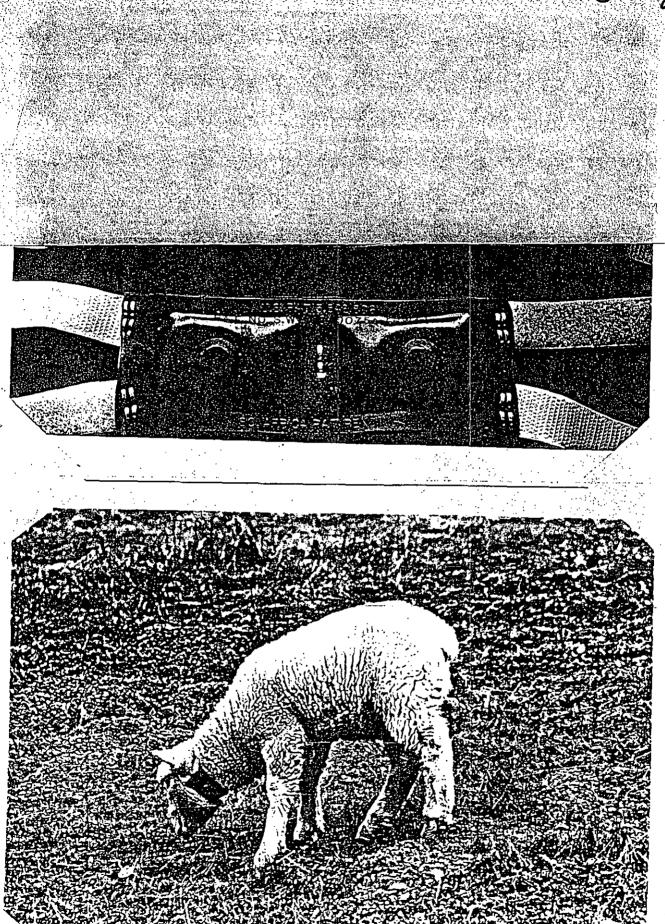
- 1. When coyotes attack sheep or goats, they usually bite at the throat. The Livestock Protection Collar is an effective way to deliver chemicals selectively to depredating coyotes.
- 2. A coyote attacked this Angora goat at the rear, but did not puncture the collar. The goat had to be destroyed.
- 3. Livestock Protection Collar; Each toxicant reservoir is 1.5 inches wide by 2.25 inches long. The beige Velcro straps are 0.75 inches wide and 22-24 inches long.
- 4. Livestock Protection Collar on a 30-pound lamb. Note that the toxicant reservoir comes up almost to the ear.
- 5. Livestock Protection Collar on an Angora goat.
- 6. Elastic-strap Livestock Protection Collar on a 50-pound lamb. In the field tests on Angora goats, the rate of collar puncture by attacking coyotes was lower for elastic-strap than for Velcro-strap collars.
- 7. The corner of this collar tore when the collar was being removed from an Angora goat. To avoid such damage, a knife or scissors can be used to free collar straps from hair or wool.
- 8. The rubber portion of this collar was poorly attached to the neck straps. Repairs can be made by sewing or stapling neck straps back in position. Only heavy thread or staples should be used.
- 9. The collar is too small for effective coverage on this 100-pound lamb.
- 10. This lamb's collar is too small. Note the unprotected region below the ear.
- 11. To keep the collar in position on this Angora goat, the forward collar strap was tied to a horn using butcher's twine. Any heavy string or cord will do.
- 12. An ordinary office stapler can be used to tack collar strap ends in place. These staples are inadequate for reattaching straps to collars (see photo 8).

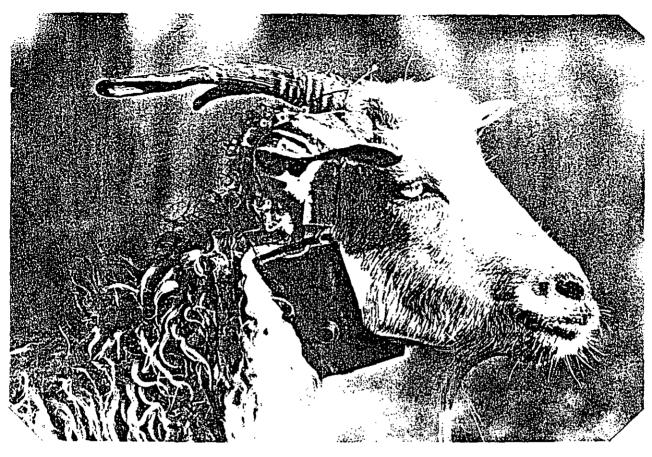
^{*}Photo 2 by D.A. Wade, Texas Agricultural Extension: other by G. Connolly

- 13. The collar on this Angora goat has slipped back out of position. If the collar was in this position when a coyote attacked, the collar probably would not be punctured.
- 14. If collar straps are too tight, they will produce abrasions that become infected and attract flies, as shown on this Angora goat. This problem, which is more common with goats than sheep, can be avoided by frequently checking strap tension.
- 15. Numbered ear tags are a valuable aid in keeping track of collared livestock. The numbers on this tag can be read at a distance of 50 feet or more.
- 16. Checking of collared livestock is easy if the animals are trained to come for feed.
- 17. Typical remains of a collared lamb that was killed and fed upon by coyotes. The collar was punctured.
- 18. A Livestock Protection Collar punctured by prickly pear thorns. Thorn punctures are smaller than coyote tooth punctures. This damaged collar cannot be reused.
- 19. This coyote was found dead 0.4 miles from the spot where it attacked a collared lamb and punctured the collar. Laboratory analyses confirmed that it was killed by the collar toxicant, Compound 1080.
- 20. Flocks of adult Angora goats can be protected with Livestock Protection Collars by adding 5 to 10 collared kids per 100 un-collared adults. Two collared kids appear in this photograph (facing camera, left of center). Test statistics revealed a high rate of coyote selection for kids.

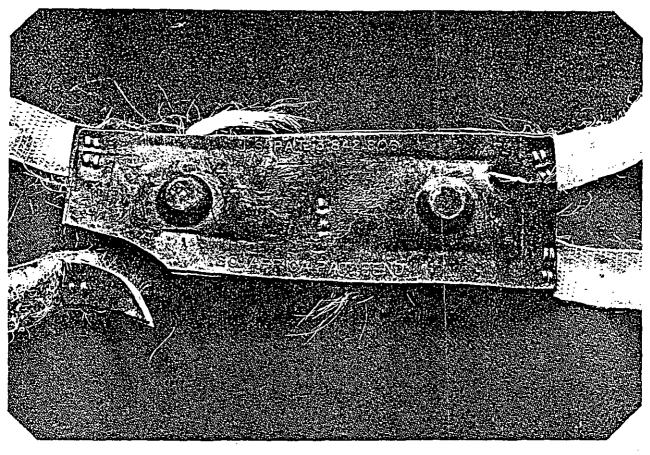


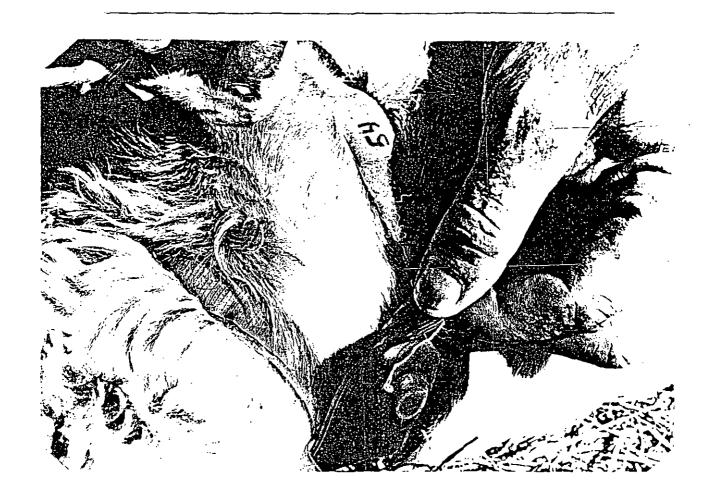


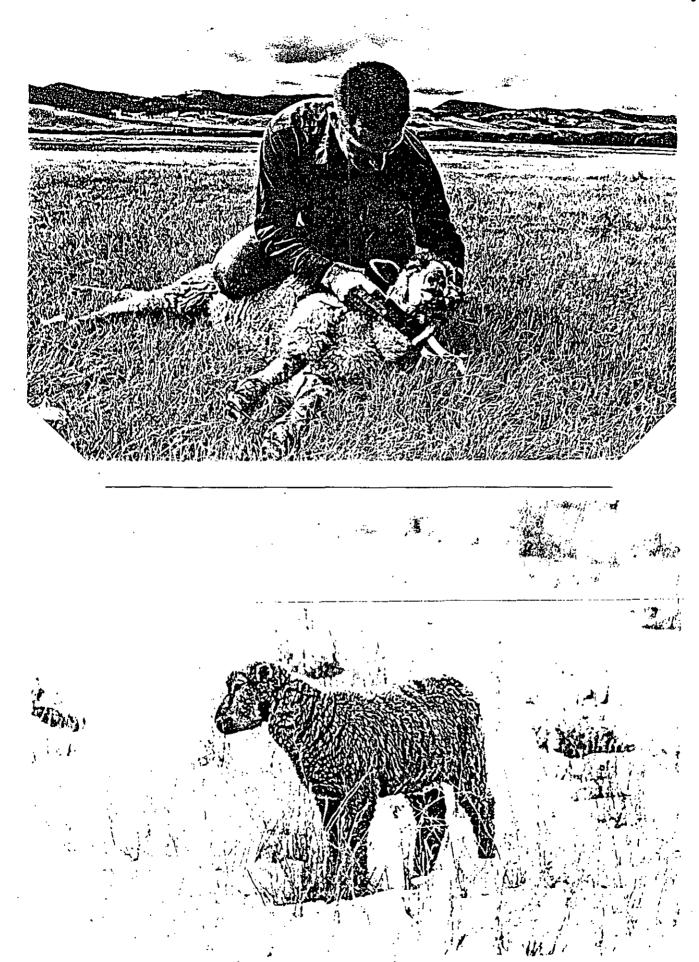




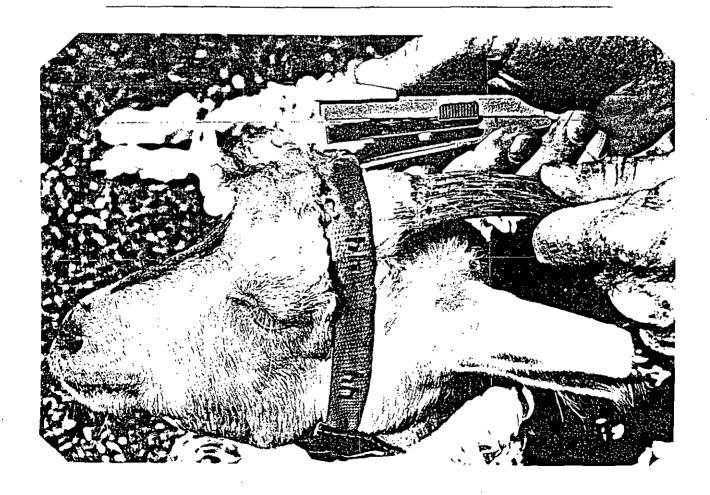








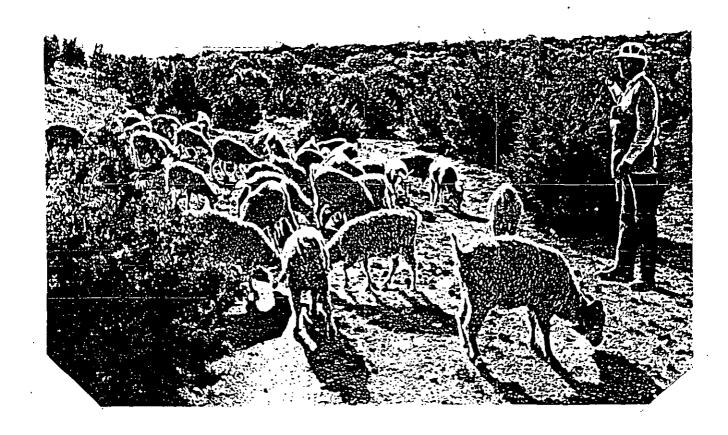


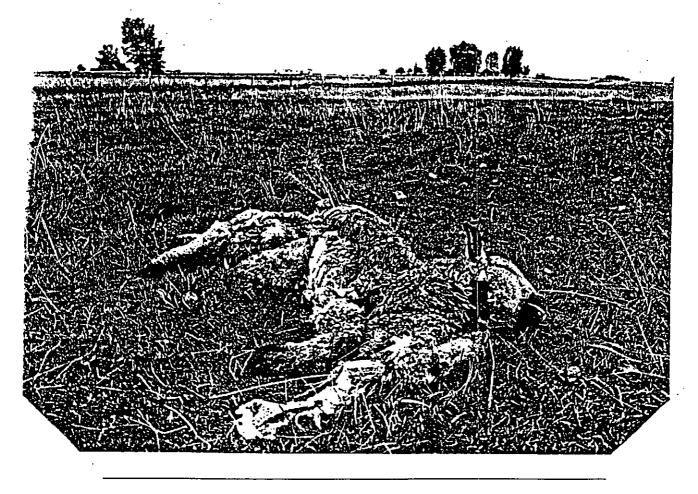


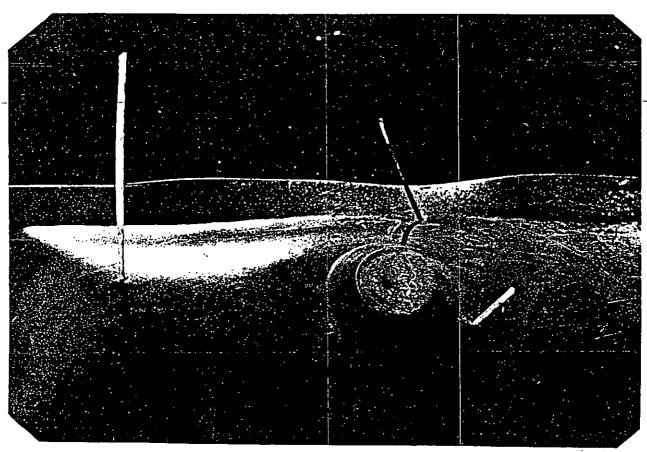




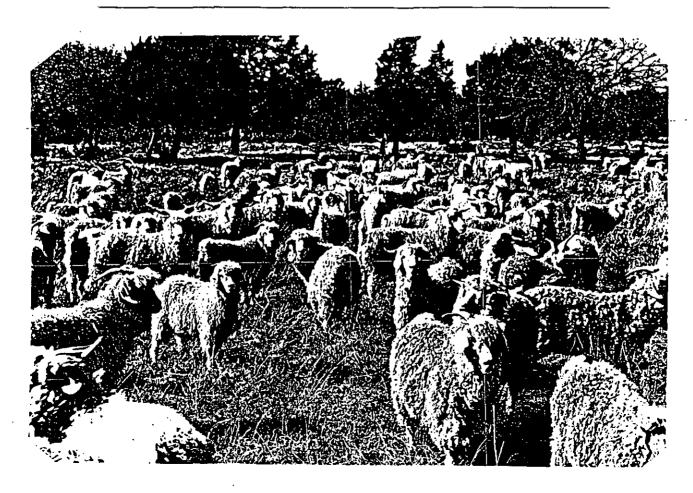












APPENDIX E

5 .

SOUTH DAKOTA DEPARTMENT OF AGRICULTURE LIVESTOCK PROTECTION COLLAR MONTHLY REPORT

AFPLICATOR'S NAME		
ADDRESS	(ONE REPORT PER FLOCK)	MONTH/YEAR OF REPORT
CITY		NUMBER OF COLLARS 18 POSSESSION THIS MONTH
574TE		DATE COLLARS OBTAINED
ZIF	LOCATION OF FLOCK	COUNTYIS) COLLARS USED
TELEPHONE		•
APPLICATOR LICENSE NUMBER		

	Collars Placed on	Livestock	Date Placed	Date Removed		Rezsor	tor Removal	Demege	d Collars	}			Dail	es Collar nected "	5			Number and Species
Collar ID Number	Earlag Number	Species	On Animal	From Animal	Damaged	Date Lost	Returned To Storage	Date Repaired	Date Replaced				141	i Mimmun Le a Week				Of Animals Recovered
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IF ANY ACCIDENTS INVOLVING LP COLLARS HAVE OCCURRED DURINGTHIS REPORTING PERIOD THAT RESULTED NECESSARY REPORT.	DININJURY TO HUMANS, DOMESTIC ANIMALS, OR NON-TARGET SPECIES, CHECK BOX AND FILE
* If additional space is needed, use the back side of this form.	
NUMBER OF COLLARS IN FIELD (Beginning of Month)	Applicator's Signature
NUMBER OF COLLARS IN FIELD (End of Month)	Recorded by:

SOUTH DAKOTA DEPARTMENT OF AGRICULTURE LIVESTOCK PROTECTION COLLAR INDIVIDUAL COLLAR SUMMARY REPORT

37 7 38

APPLICATOR'S NAME
LICENSE OR CERTIFICATION NUMBER
DATE REPORT FILED
COLLAR ID NUMBER
DATE OF LAST PLACEMENT ON ANIMAL
ANIMAL EARTAG NUMBER
LAND DESCRIPTION: NAME OF PASTURE OR LOCATION (Legal Description)
DATES COLLAR CHECKED (Minimum of Once a Week)
DATE COLLAR REMOVED OR LOST FROM ANIMAL_
REASON FOR REMOVAL:
[] 1. RETURNED TO POOL MANAGER STORAGE. [] 2. DAMAGE (Indicate type of damage and cause, if known.)
A. If punctured, indicate side damage. LEFT RIGHT BOTH B. If not punctured, indicate action taken.
[] Repaired
[] 3. LOST (Indicate last known or probable location.)
FINAL DISPOSITION OF COLLAR. Check appropriate answer.
[] BURIED [] LOST [] RETURNED TO POOL MANAGER STORAGE.
FINAL DISPOSITION OF CONTAMINATED ANIMALS. (METHOD AND LOCATION)

SOUTH DAKOTA DEPARTMENT OF AGRICULTURE LIVESTOCK PROTECTION COLLAR ACCIDENT REPORT

)	PESTICIDE APPLICATOR:		
	NAME:	Appl. Lic. or ce	rt. No
	ADDRESS:	<u>.</u>	
	DATE OF ACCIDENT: LOCATION: TWSHP RANGE LANDOWNER/LEASEE:		
	LOCATION: TWSHP RANGE	SECTION	1/4
	LANDOWNER/LEASEE:		 _
	ADDRESS:		
	ADDRESS: WARNING SIGNS IN USE AT ACCIDENT SI	TE: YES	NO
	NAME OF PERSON(S) INVOLVED IN ACCIDE	ENT:	
	ACCIDENT RESULTED IN CONTAMINATION O	OF:	
	CLOTHING FOOD WATER	VEHICLE	BLDG
	OTHER (SPECIFY)		
	WHICH OF THE FOLLOWING WERE INVOLVED):	<u> </u>
	STORAGE USE TRANSPORTA		EMOVAL
	DISPOSALOTHER (SPECIFY)		
2)	INJURED PERSON(S):		
•	NAME		AGE:
	ADDRESS:	·	
	OCCUPATION:		
	OCCUPATION: DID PERSON(S) SEE A DOCTOR: DOCTOR'S NAME:	YES	NO
	DOCTOR'S NAME:		
	Document of American		
	WAS PERSON(S) HOSPITALIZED:	YES	NO.
	IF YES. WHERE:	· · · · · · · · · · · · · · · · · · ·	
	IF YES, WHERE: DID PERSON(S) RECEIVE FIRST AID ON	STTE: VES	NO
3)	IF ACCIDENT INVOLVED NON-TARGET OR D	OMESTIC ANIMALS:	
	NUMBER OF ANIMALS FOUND:		
	LOCATION:		
	SUSPECTED CAUSE OF DEATH:		
	WAS ACTUAL CAUSE OF DEATH DETERMINE		NO
	IF YES, HOW WAS IT DETERMINED:		
	LABORATORY ANALYSIS	PHYSICAL EVIDE	NCE
	AUTOPSY		
REN	MARKS		
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