

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Sodium Cyanide may be fatal if swallowed or inhaled. Use only with adequate ventilation and do not breathe the gas or dust. When handling, setting out or checking M-44 cyanide capsules, always have at least six pearls of Amyl-Nitrite readily available in case sodium cyanide is swallowed or inhaled.

When handling sodium cyanide capsules, protect hands with gloves and shield eyes to prevent eye burns and skin irritation. Wash thoroughly before eating or smoking. Do not use in areas frequented by humans or domestic dogs.

ENVIRONMENTAL HAZARDS

This pesticide is TOXIC TO WILDLIFE. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes. The M-44 ejector device cannot be used in areas inhabited by endangered canids and felids.

CHEMICAL HAZARDS

Contact with acid liberates poisonous and flammable hydrogen cyanide gas.

RESTRICTED USE PESTICIDE

For use only by Trained Applicators who have obtained a current permit from the Kansas Fish and Game Commission and use must be in accordance with all State and Federal regulations.

M-44 CYANIDE CAPSULES

For use in the M-44 ejector device to control coyotes (*Canis latrans*), and wild dogs that depredate livestock.

Active ingredient:
Sodium Cyanide..... 88.78%
Inert Ingredients..... 11.22%
Total..... 100.00%
50 Capsules. Net Weight 50 grams

KEEP OFF OF THE REAR OF CHILDREN

DANGER



POISON

STATEMENT OF PRACTICAL TREATMENT

If swallowed or inhaled, prompt treatment is of the utmost importance. Carry patient to fresh air, have him lie down. Patient should breathe the contents of an Amyl Nitrite pearl 15-30 seconds each minute if necessary, until five pearls have been used. Use artificial respiration if breathing has stopped. Remove contaminated clothing, but keep patient warm. CALL A PHYSICIAN IMMEDIATELY. If on skin, immediately flush with plenty of water. If in eyes, immediately flush with plenty of water and call a physician. SEE LEFT SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

DIRECTIONS FOR USE

It is violation of Federal ^{and state} law to use this product in a manner inconsistent with its labeling. For use in specific situations to reduce canids (coyotes and wild dogs) that depredate livestock. For use on pastures and rangeland. Do not place in areas where food crops are planted.

IMPORTANT - Before handling or placing M-44 cyanide capsules or M-44 ejector devices, consult the Use Restriction Bulletin for specific use directions, additional precautions, information on endangered species, warning signs and antidotal measures. ^{Federal and state regulations}

WARNING SIGNS

Warning signs must be posted in the general area and at the application site. Bilingual (Spanish/English) warning signs must be posted in the general area and at the application site.

STORAGE AND DISPOSAL

Storage - Store M-44 cyanide capsules under lock and key in a dry place away from food, domestic animals and acids. Do not contaminate feed or food stuffs.

Disposal - Dispose of defective and used M-44 capsules by burial in a safe location in the field or at a proper land fill site.

KANSAS STATE UNIVERSITY
MANHATTAN, KS. 66506

EPA EST. NO.
EPA REG. NO.

This Bulletin is an essential part of the label for this registration, and a copy including the carton label is to be provided to each applicator.

1. Use of the M-44 device shall conform to all applicable Federal, State, and local laws and regulations.
2. Applicators shall be subject to such other regulations and restrictions as may be prescribed from time to time by the U.S. Environmental Protection Agency.
3. Each applicator of the M-44 device shall be trained in: (1) safe handling of the capsules and device; (2) proper use of the antidote kit; (3) proper placement of the device; (4) necessary record keeping.
4. M-44 devices and sodium cyanide capsules shall not be sold or transferred to, or entrusted to the care of any person not supervised or monitored, by the U.S. Fish and Wildlife Service or any agency not working under a Fish and Wildlife Service cooperative agreement.
5. The M-44 device shall only be used to take wild canids suspected of preying upon livestock and poultry.
6. The M-44 device shall not be used solely to take animals for the value of their fur.
7. The M-44 device shall only be used in instances where actual livestock losses due to predation by wild canids are occurring or, based on documented prior experience indicating a recurring or seasonal predator problem in a specific area, where actual livestock losses due to wild canid predators can reasonably be expected to occur. In each case an evaluation will be made and documented so as to include livestock losses and evidence of depredated species prior to application of M-44 devices.
8. The M-44 device shall not be used in: (a) National or State Parks; (b) National or State Monuments; (c) Federally designated wilderness areas; (d) Wildlife refuge areas; (e) Areas within national forests or other Federal lands specifically set aside for recreational use; (f) prairie dog towns; and (g) Areas where exposure to the public and family pets is probable.
9. The M-44 device shall not be used in areas where threatened or endangered animal species might be adversely affected. Each applicator shall be issued a map which clearly indicates such areas.
10. One person other than the individual applicator shall have knowledge of the exact location of all M-44 devices in the field.

11. In areas where more than one governmental agency is authorized to place M-44 devices, the agencies shall exchange placement information and other relevant facts to insure that the maximum number of M-44 devices is not exceeded.
12. The M-44 device shall not be placed within two hundred (200) feet of any lake, stream, or other body of water, provided that natural depression areas which catch and hold rainfall only for short periods of time shall not be considered "bodies of water" for purposes of this restriction.
13. The M-44 device shall not be placed in areas where food crops are planted.
14. The M-44 device shall be placed at least fifty (50) feet distance or at such greater distance from any public road or pathway as may be necessary to remove it from the sight of persons and domestic animals using any such public road or pathway.
15. The density of M-44 devices used shall be the minimum necessary to reduce losses as a rule, but the maximum density of M-44 devices in any 100 acre pastureland shall not exceed ten (10), and in any one square mile of open range shall not exceed twelve (12).
16. No M-44 device shall be placed within thirty (30) feet of a livestock carcass used as a draw station; no more than four (4) M-44 devices shall be placed at any single draw station; and no more than three (3) draw stations shall be operated in any one square mile of area.
17. Supervisors of applicators shall check the records, warning signs, and M-44 devices of each applicator at least once a year to verify that all applicable laws, regulations, and restrictions are being strictly followed.
18. Each M-44 device shall be inspected by the applicator at least once a week to check for interference or unusual conditions and shall be serviced as required.
19. Damaged or non-functional M-44 device shall be removed from the field.
20. An M-44 device shall be removed from an area if, after thirty (30) days there is a cessation of losses due to target predators in the area.
21. All persons authorized to possess and use sodium cyanide capsules and M-44 devices shall store such capsules and devices under lock and key.

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22. Used sodium cyanide capsules shall be disposed of by deep burial or at a proper landfill site.

23. Bilingual warning signs in English and Spanish shall be used in all areas containing M-44 devices. All such signs shall be removed when M-44 devices are removed.

a. Main entrances or commonly used access points to areas in which M-44 devices are set shall be posted with warning signs to alert the public to the toxic nature of the cyanide and to the danger to pets. Signs shall be inspected weekly to insure their continued presence and insure that they are conspicuous and legible.

b. An elevated sign shall be placed within six (6) feet of each individual M-44 device warning persons not to handle the device.

"24. Each authorized licensed applicator shall carry an antidote kit on his person when placing and or inspecting M-44 devices. The kit shall contain at least six pearls of amygdalite and instructions on their use. Each authorized or licensed applicator shall also carry on his person instructions for obtaining medical assistance in the event of accidental exposure to sodium cyanide."

25. In all areas where the use of the M-44 device is anticipated, local medical people shall be notified of the intended use. This notification may be through a poison control center, local medical society, the public health service, or directly to a doctor or hospital. They shall be advised of the antidote and first-aid measures required for treatment of cyanide poisoning. It shall be the responsibility of the supervisor to perform this function.

26. Each applicator shall keep records dealing with the placement of the device and the results of each placement. Such records shall include, but need not be limited to:

- a. The number of devices placed.
- b. The location of each device placed.
- c. The dates of each placement, inspection and removal.
- d. The number and location of devices which have been discharged and the apparent reason.
- e. Species of animals taken.
- f. All accidents or injuries to humans or domestic animals.

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NEW KANSAS REGULATIONS REGARDING M-44 USE

23-6-7. Cyanide gas or other poisonous gas, gun, bomb, other device; use in wildlife control. Subject to federal and state laws, and rules and regulations, cyanide gas or other poisonous gas guns or devices may be used in duly authorized wildlife control programs subject to the limitations and restrictions that follows:

- (a) A permit for use of cyanide gas or other poisonous gas guns or

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(24)

devices shall be secured from the director, fish and game commission, Pratt, Kansas 67124. A permit shall be issued by the director only upon the recommendation of Kansas state university extension wildlife damage control specialists or the state zoologist.

(b) The application for permit shall be made on forms provided by the commission and shall include a legal description of the property on which the cyanide gas or other poisonous gas guns or devices will be operated.

(c) Permits shall be limited to landowners and legal tenants of land and shall be applicable and valid only on land legally owned or leased.

(d) Permit duration shall not exceed the period recommended by the Kansas state university extension wildlife damage control specialists or the state zoologist. The permit duration shall not exceed 120 days.

(e) Warning signs indicating use of cyanide gas or other poisonous gas guns or devices shall be conspicuously placed at all property access points and corners. One elevated warning sign shall be placed within six feet of any cyanide gas or other poisonous gas gun or device. Signs shall only be posted while the cyanide gas or other poisonous gas guns or devices are in use. Signs used shall be approved by both the director, fish and game commission, and the Kansas state university wildlife damage control specialists.

(f) All persons issued permits shall maintain records of use of cyanide gas or other poisonous gas guns or devices on forms provided by the commission. The records shall be submitted to the director, fish and game commission, within 30 days of permit expiration.

(g) Cyanide gas devices and all necessary materials, supplies, and equipment (including signs) shall be available only through the Kansas state university wildlife damage control specialists on a demonstration or loan basis.

(h) All use of cyanide gas or other poisonous gas guns or devices shall be in conformity with conditions specified on the permit.

(i) The director shall have the right to refuse to issue a permit for use of cyanide gas or other poisonous gas guns or devices when the director has determined there is: a lack of justification or information; incorrect information; prior history of permit abuse by the applicant or lack of cooperation; or potential danger to the public, natural resources, or environment.

(Authorized by and implementing K.S.A. 32-158 and 74-3302; effective May 1, 1983.)

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Suggested Storage and Disposal Statements
M-44 Sodium Cyanide
Kansas Fish and Game Commission

STORAGE AND DISPOSAL [12 pt] 1/

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

STORAGE: Store M-44 cyanide capsules under lock and key in a dry place away from food, domestic animals and acids.

PESTICIDE DISPOSAL:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the hazardous waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

Dispose of box in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

As shown front label of 12 pt. 102

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APPENDIX I

1. The proposed program for administering the M-44 program and training applicators appears to be sound. The 70% minimum passing score for the written examination appears to be too lenient, however. This would be especially true if the exam were to be published as an appendix to the manual. Potential users could memorize the answers needed to pass the test and miss all of the rationale and logic behind the various procedures required for effective and safe use of the M-44. The manual implies that producers already certified as "Private Applicators" for other pesticides uses would only have to attend the four-hour training course and would not be required to take the exam.

We believe that all potential M-44 users should be required to pass the exam, the minimum passing score should be at least 80%, and that the exact test should not be made public. The manual could present "sample test questions" or even a "sample test", but the actual test administered should differ from that presented in the manual. Potential users should also be required to provide the names of the government agencies from whom they obtain permits and materials (as opposed to being asked to pick the appropriate agency out of a "multiple choice" or "true-false" format.)

2. The proposed labeling is appropriate and acceptable.
3. The proposed training manual is excellent as far as its content is concerned. However, it contains an enormous number of grammatical errors which would be likely to distract and confuse readers.

A competent editor should review it before it is resubmitted. Some of the major errors are listed below.

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDES PROGRAMS REGISTRATION DIVISION (811-5671) WASHINGTON, D.C. 20460	EPA REGISTRATION NO.	DATE OF ISSUANCE
	TERM OF ISSUANCE	
NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> REGISTRATION <input type="checkbox"/> RENEWAL <i>Under the Federal Insecticide, Fungicide and Rodenticide Act, as amended.</i>	NAME OF PESTICIDE PRODUCT	
	NAME AND ADDRESS OF REGISTRANT (include ZIP code) <div style="text-align: right;"> $\frac{16}{18}$ $\frac{110,390}{1}$ </div>	
NOTE Changes in labeling formula 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 the above EPA registration number.		
On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.		
A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.		
Registration is in no way to be construed as an endorsement or approval of this product by this 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.		
<input type="checkbox"/> ATTACHMENT IS APPLICABLE		
SIGNATURE AND TITLE OF OFFICIAL		DATE

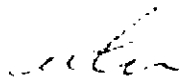
- 7
- d. Revise your "Storage and Disposal" statements in accordance with the enclosed sheet.
 - e. Refer to Appendix 1 for our suggestions on your training program and manual. For the record, submit a copy of the final printed revision of the training manual.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

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

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

Sincerely,



William E. Miller
Product Manager (16)
Insecticide-Resistant Branch

Registration Division (7-767)