



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 6, 2021

James Warren  
Environmental Protection Specialist  
Environmental and Risk Analysis Services  
USDA APHIS  
4700 River Road, Unit 149  
Riverdale, MD 20737

Subject: Amendment to Add a Supplemental Label – Second attempt to eradicate Polynesian rats (*Rattus exulans*) on Wake Atoll following the previous attempt in 2012.  
Product Name: Brodifacoum-25W Conservation  
EPA Registration Number: 56228-36  
Application Date: July 21, 2021  
Decision Number: 578033

Dear Dr. Warren:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval is only for a supplemental label that is an addendum to the master label. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

This supplemental labeling contains some new and/or revised uses and/or directions which may be additional to the uses and/or directions found on the label on or attached to the container, but this supplemental labeling does not by itself constitute the complete set of use directions. The complete set of use directions is set forth on the container label as combined with this supplemental labeling.

To allow for the successful restoration of the island's ecosystem and nest habitat for various seabird species, all invasive Polynesian rat must be killed. To achieve this goal, the eradication program involves multiple application methods, including aerial broadcast, bait stations, bait trays, bait bolas, burrow baiting and hand baiting. These application methods will consequently result in accessibility of bait to nontarget species. However, many of the nontarget species will be at their lowest numbers during the time of application and the benefits of the long-term goals of protecting and restoring native ecosystems and species by removing invasive Polynesian rat is believed to be justified and to outweigh these potential risks.

A stamped copy of your labeling is enclosed for your records. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling.

Your release for shipment of the product constitutes acceptance of these conditions. **This supplemental label will expire on December 31, 2026.** A monitoring plan must be submitted to the Agency that includes the monitoring actions prior to, during, and after the implementation of eradication within one year of completion of the eradication project. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Ralph Narain by phone at 202-566-2853, or via email at [Narain.Ralph@epa.gov](mailto:Narain.Ralph@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Product Manager 7  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

# RESTRICTED USE PESTICIDE

## DUE TO HAZARDS TO NON-TARGET SPECIES

For retail sale only to employees of federal agencies conducting rodent control or eradication for conservation purposes, or persons working under their authority, and to be used only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# SUPPLEMENTAL LABELING BRODIFACOUM-25W CONSERVATION

EPA Reg. No. 56228-36

*For control and eradication of Polynesian rats on Wake Atoll.*

**This supplemental label is only for use on Wake Atoll and expires on December 31, 2026.**

### ACTIVE INGREDIENT:

Brodifacoum (CAS No. 56073-10-0):.....0.0025%

### OTHER INGREDIENTS:

.....99.9975%

### TOTAL:

.....100.0000%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

### FIRST AID

<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a physician or poison control center immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of soap and water for 15-20 minutes.</li><li>• Call a poison control center or doctor immediately for further treatment advice.</li></ul>
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor immediately for further treatment advice.</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor immediately for treatment advice.</li></ul>

### HAVE LABEL WHEN OBTAINING TREATMENT ADVICE

Have the product container or label with you when calling a poison control center or doctor or going for treatment. If you need immediate medical attention, call the Poison Control Center at 1-800-222-1222, a doctor, or 877-854-2494. For non-emergency information concerning this product, call the National Pesticide Information Center at 1-800-858-7378.

### NOTE TO PHYSICIAN

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K<sub>1</sub>, intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

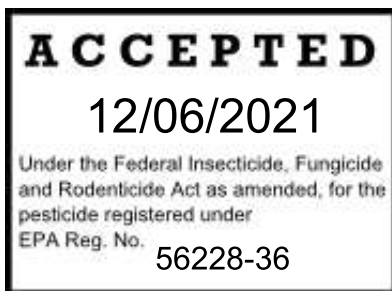
### TREATMENT FOR PET POISONING

If pet eats the bait, call a veterinarian at once.

### NOTE TO VETERINARIAN

For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), administer Vitamin K<sub>1</sub>.

Manufactured for:  
United States Department of Agriculture  
Animal and Plant Health Inspection Service  
4700 River Road, Unit 149  
Riverdale, MD 20737  
EPA Est. 12455-WI-1



Net Contents: \_\_\_\_\_

Batch Code: \_\_\_\_\_

# PRECAUTIONARY STATEMENTS

## CAUTION

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from humans, domestic animals, and pets.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Barrier laminate gloves
- Shoes plus socks

For aerial application, in addition to the above PPE, loaders and any person who retrieves unused bait following aerial application of this product must wear:

- Protective eyewear or face shield
- A minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters.

Any person who retrieves carcasses or unused bait following application of this product must wear:

- Barrier laminate gloves

### USER SAFETY REQUIREMENTS

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions are provided for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of barrier laminate gloves before removing. As soon as possible, wash hands thoroughly after applying the bait and before eating, drinking, chewing gum, using tobacco, or using the toilet, and change into clean clothing.

### ENVIRONMENTAL HAZARDS

This product is extremely toxic to birds, mammals, and aquatic organisms. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. Runoff may be hazardous to aquatic organisms in water adjacent to treated areas. **DO NOT** contaminate water when disposing of equipment wash water or rinsate.

## DIRECTIONS FOR USE

**It is a violation of Federal law to use this product in a manner inconsistent with its labeling. A copy of this supplemental labeling and the main labeling for Brodifacoum-25W Conservation (EPA Reg. No. 56228-36) must be in the possession of the user at the time of application.**

**READ THIS LABEL:** Read this supplemental label and the main label for Brodifacoum-25W Conservation before applying this product.

This product must be used strictly in accordance with this label's precautionary statements and use directions, as well as with all applicable state and federal laws and regulations.

### USE RESTRICTIONS

This supplemental label applies only to the control and eradication of Polynesian rats (*Rattus exulans*) on Wake Atoll. All modifications to EPA Reg. No. 56228-36 contained in this supplemental label apply only to this eradication effort.

**The maximum amount of bait applied by hand broadcast and/or aerial broadcast applications to Wake Atoll in the primary baiting operation may not exceed 135 lb./acre (150 kg/ha) under this supplemental label.** In areas where aerially broadcast bait swaths or hand broadcast areas overlap, the amount of bait applied may exceed the maximum broadcast application rate. This will occur in the coastal/interior overlap zone and could also occur along adjacent borders of baiting swaths, at the end of swaths where they intercept the swaths created by shoreline or other perimeter baiting, and from back baiting. Applicators should minimize areas where the allowable application rate is exceeded as much as possible while ensuring that all areas are baited sufficiently.

If rats (or rat sign) are found following commencement of the first bait application, additional small-scale hand spot baiting or hand broadcast applications are permitted up to 12 months following commencement of the first bait application and only in the area where the rat or rat sign was found, in an effort to eliminate the few remaining survivors.

Applicators shall not make aerial broadcast applications in sustained winds exceeding 35 mph (30 knots). The pilot in command has final authority for determining safe flying conditions.

## DIRECTIONS FOR USE, continued

### APPLICATION DIRECTIONS

#### HAND BAITING APPLICATIONS:

Applicators may use the hand baiting methods at use sites as specified in Table 1. If rat activity persists or resumes, continue hand baiting applications as specified in Table 1. Maintain treatments for as long as rat activity is evident in the area and rats appear to be accepting the bait, but no longer than 12 months following commencement of the first bait application.

**Table 1.**

Application method	Use sites	Application rates	Additional baiting instructions
Enclosed bait stations (either tubes or bait boxes with lids)	<ul style="list-style-type: none"> <li>• Within and around any man-made structure, including hydroponic gardens, greenhouses, kitchens, and cafeterias</li> <li>• Within or around non-operational ventilation ducts</li> <li>• Around the perimeter of freshwater tanks, seeps, pools, and ponds</li> <li>• All other non-crop areas on islands, including canopies of trees and shrubs and subterranean spaces</li> </ul>	<ul style="list-style-type: none"> <li>• 4–16 ounces (113–454 grams) per bait station</li> <li>• Space bait stations at intervals of approximately 16–82 feet (5–25 meters) in a grid over the area</li> <li>• Check and replenish bait stations at least once every 7–21 days</li> </ul>	<ul style="list-style-type: none"> <li>• Where a continuous source of infestation is present, permanent bait stations may be established and bait replenished as needed.</li> </ul>
Elevated and floating bait stations (either tubes or bait boxes with lids)	<ul style="list-style-type: none"> <li>• Intertidal zones above the mean low tide mark and below the mean high tide water mark</li> <li>• Any other non-crop areas that may be routinely inundated with water, including subterranean spaces</li> </ul>	<ul style="list-style-type: none"> <li>• 4–16 ounces (113–454 grams) per bait station</li> <li>• Space bait stations at intervals of approximately 16–82 feet (5–25 meters) in a grid over the area</li> <li>• Check and replenish bait stations at least once every 7–21 days</li> </ul>	<ul style="list-style-type: none"> <li>• Elevated bait stations must be positioned or attached to a stationary object at a height above the mean high tide water mark.</li> <li>• Floating bait stations may be used within rodent habitat in intertidal zones or subterranean spaces where the water is calm enough that the bait stations will not be inundated with water or capsize. Bait stations must be able to stay upright when afloat and must be tethered or attached to a stationary object. Do not apply bait to floating bait stations in intertidal zones if stormy weather is forecast before any remaining bait can be removed.</li> </ul>
Bait trays and bait sachets	<ul style="list-style-type: none"> <li>• Within and around institutional structures, including office buildings, workshops, utility buildings, supply sheds, and recreational buildings</li> <li>• Within and around any uninhabited man-made structures, including ocean piers and ramps</li> <li>• Around the perimeter of hydroponic gardens or greenhouses, freshwater tanks, seeps, pools, and ponds</li> <li>• All other non-crop areas on islands, including canopies of trees and shrubs and subterranean spaces</li> </ul>	<ul style="list-style-type: none"> <li>• 4–16 ounces (113–454 grams) per bait tray or within a sachet (small bag made of rodent accessible material). Holes should be made in plastic bags to allow the bait odor to escape. Plastic bags may be left unperforated if applied in areas where occasional immersion in water may occur.</li> <li>• Space bait trays, sachets, or bolas at intervals of approximately 16–82 feet (5–25 meters) or more in a grid over the area</li> <li>• Check and replenish bait stations at least once every 7–21 days</li> </ul>	<ul style="list-style-type: none"> <li>• Place or tie sachets in trees or shrubs by hand or use long poles (or other devices). The sachets may be fitted with line or string attachments or tied together into bolas. Alternately, sachets may be tied at intervals along a continuous line or string (i.e., daisy chain) that extends along or through the canopy or shrubs.</li> <li>• Throw or drop sachets into areas that are unsafe or difficult for applicators to access. Alternately, launching devices, such as slingshots or t-shirt cannons, or payload unmanned aerial vehicles (UAV) may be used to apply sachets.</li> <li>• Where a continuous source of infestation is present, permanent bait trays may be established and bait replenished as needed.</li> </ul>
Burrow baiting	<ul style="list-style-type: none"> <li>• Rat burrows in non-crop areas</li> </ul>	<ul style="list-style-type: none"> <li>• 3–4 ounces (85–113 grams) in a pile per burrow entrance</li> <li>• Check every 7–21 days and reapply bait if the bait has been removed</li> </ul>	<ul style="list-style-type: none"> <li>• Flag treated burrows</li> </ul>

## DIRECTIONS FOR USE, continued

### APPLICATION DIRECTIONS, continued

#### BROADCAST APPLICATIONS:

Up to three broadcast applications at a rate of up to 45 lb./acre (50 kg/ha) of bait per application may be made to Wake Atoll during the primary eradication effort as specified in Table 2. Each broadcast application to Wake Atoll should be completed within a period of 5 consecutive days. If a broadcast application is interrupted due to poor weather conditions or other logistical considerations, the remainder of the application should be completed within the next 7 days, and “back baiting” (re-baiting) of previously baited areas is permitted.

For the two primary broadcast applications, the ideal interval between applications is approximately 21 days. However, depending on local weather conditions or other logistical considerations, applications may occur anytime between 14 and 28 days.

An additional “middle” broadcast application may be made in areas with high bait disappearance rates due to bait weathering or consumption, where the amount of bait remaining on the ground at 4 days following the first application is determined to be less than ~30% of the original amount. This additional middle application may occur anytime between 5 and 14 days following the first application.

Before making broadcast applications, prune all fruit and cover food producing citrus trees, cover or dismantle any food-producing garden plots and pots, and cover freshwater wells, tanks, pools, and ponds as appropriate. Covers must prevent accumulation of bait in these areas and/or allow for removal of bait accumulated on covers.

**Table 2.**

<b>Broadcast application method</b>	<b>Use sites</b>	<b>Additional baiting instructions</b>
Hand broadcast (hand, scoop, or ground broadcast equipment)	<ul style="list-style-type: none"><li>• Non-crop areas</li><li>• Within, around, and on top of uninhabited or abandoned structures</li><li>• Around and on top of inhabited man-made structures or covered areas</li><li>• Within subterranean areas or structures that are not regularly flooded with water</li></ul>	<ul style="list-style-type: none"><li>• Do not broadcast bait in coastal areas or brackish inland wetlands below the mean high tide water mark.</li><li>• If freshwater pools and ponds cannot be adequately covered, do not hand broadcast bait within 3.3 feet (1 meter) of the water's edge.</li><li>• Do not hand broadcast bait within the drip line of food producing citrus trees.</li></ul>

## DIRECTIONS FOR USE, continued

### APPLICATION DIRECTIONS, continued

#### BROADCAST APPLICATIONS, continued

Table 2., continued

Broadcast application method	Use sites	Additional baiting instructions
<p>Aerial broadcast (helicopter or unmanned aerial vehicles (UAV))</p>	<ul style="list-style-type: none"> <li>• Non-crop areas</li> <li>• Around and on top of all man-made structures</li> <li>• Around and on top of pruned, dismantled, or covered food producing areas and covered freshwater wells, tanks, pool, and ponds</li> </ul>	<ul style="list-style-type: none"> <li>• Do not broadcast bait in coastal areas or brackish inland wetlands below the mean high tide water mark.</li> <li>• When aerially broadcasting bait within the coastal zone or around uncovered inland water bodies, use a deflector shield (helicopter) or a directional bait spreader (UAV) that directs bait away from the water's edge. Alternately, trickle baiting (narrow width bucket) baiting by UAV or manned helicopter may be used. The coastal zone is anywhere within 16.4 feet (5 meters) of the water's edge. For uncovered inland water bodies, do not aerially broadcast bait within 3.3 feet (1 meter) of the water's edge.</li> <li>• An additional swath of bait targeting where swaths along the coastal zone intersect with interior swaths may be aerially broadcast at a rate of no more than 45 lbs/acre (50 kg/ha).</li> <li>• At points where aerially broadcast bait swaths or hand broadcast areas overlap, the amount of bait applied may exceed the maximum broadcast application rate. This will occur in the coastal/interior overlap zone and could also occur along adjacent borders of bait swaths, at the end of swaths where they intercept the swaths created by shoreline or other perimeter baiting, and from back baiting.</li> <li>• Baits dropped on the Wake Island Airfield's runway, taxiway, ramps, and parking areas must be swept up, removed and disposed of in accordance with the <b>Storage and Disposal</b> section. When collecting the excess bait, personnel must be in enclosed cabs of sweeping/blowing machinery or, if not in an enclosed cab, wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters, and Protective eyewear or face shield.</li> <li>• Remove, sweep, or rake away any bait dropped within the drip line of food producing citrus trees (any bait not within bait trays or bait stations) before the next rainfall, but no later than 24 hours after accidental placement. When collecting the excess bait, personnel must wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters, and Protective eyewear or face shield. Disposal must be done in accordance with the <b>Storage and Disposal</b> section.</li> </ul>

If rodent activity persists following the eradication effort, conduct hand baiting applications as specified in Table 1. Maintain hand baiting treatments for as long as rat activity is evident in the area and rats appear to be accepting the bait, but no longer than 12 months following the primary broadcast application. If the terrain does not permit use of hand baiting methods, continue with broadcast baiting as specified in Table 2, but limiting broadcast treatments to areas where active signs of rodents are seen and for no longer than 6 months following the primary broadcast application.

## DIRECTIONS FOR USE, continued

### POSTTREATMENT CLEAN-UP

For all methods of baiting, monitor the baited area periodically for carcasses during and after the operation as able. If practical, collect carcasses of target and non-target animals using gloves. Dispose of carcasses in accordance with federal, state, and local regulations.

Using gloves, collect and dispose of bait stations and trays at the end of control or eradication operations as specified under **STORAGE AND DISPOSAL**. Bait stations and trays applied in canopies, abandoned structures or infrastructure, or landscape features that are unsafe for applicators to access, do not have to be retrieved.

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store only in original closed container in a cool, dry place inaccessible to unauthorized people, children, and pets. Store separately from fertilizer and away from products with strong odors that may contaminate the bait and reduce acceptability. Spillage should be carefully swept up and collected for disposal.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.

**CONTAINER HANDLING: *Nonrefillable container.*** Do not reuse or refill this container.

*Plastic Containers:* Triple rinse (or equivalent) promptly after use. Offer for recycling, if available. Otherwise, puncture and dispose of empty container in a sanitary landfill or by incineration if allowed by state and local authorities.

*Paper Containers:* Dispose of empty container at an approved waste disposal facility or by incineration if allowed by state and local authorities.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all risks of use, storage, or handling of the material not in strict accordance with directions given herewith. The efficacy of the product may be reduced under high moisture conditions.