

56228-37

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY  
AND POLLUTION PREVENTION

JAN 26 2012

Stephanie Stephens  
Biological Scientist  
USDA APHIS PPD  
Environmental and Risk Analysis Service, Unit 149  
4700 River Rd.  
Riverdale, MD 20737

Subject: Supplemental Label for Brodifacoum-25D Conservation to Eradicate Roof Rats (*Rattus rattus*) on Desecheo Island  
EPA Registration No. 56228-37  
Submission Date: December 15, 2011

Dear Ms. Stephens:

The label referred to above, submitted under FIFRA, as amended, is acceptable with the following requirement:

A monitoring plan must be submitted to the Agency that includes the monitoring actions prior to, during, and after the implementation of the eradication within one year of completion of the eradication project.

To allow successful restoration of native species to Desecheo Island, all rats must be killed. To achieve this goal, the eradication program involves multiple application methods, including aerial broadcast, hand baiting, and the use of bait stations. These application methods will consequently result in accessibility of bait to nontarget species. However, the benefits of the long term goals of protecting and restoring the native species and habitat of Desecheo by removing non-native rats are believed to be justified and to outweigh these potential risks.

A stamped copy of the label is enclosed for your records. This supplemental label will expire on April 30, 2014. Please submit 1 final copy of the above mentioned label including the expiration date before releasing the product for shipment. If you have any questions regarding this label, please contact Gene Benbow at (703) 347-0235 or via email, [benbow.gene@epa.gov](mailto:benbow.gene@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert", written over a large, stylized circular flourish.

John Hebert  
Product Manager 07  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

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**RESTRICTED USE PESTICIDE**  
**DUE TO HAZARDS TO NON-TARGET SPECIES**

For retail sale only to: USDA Animal and Plant Health Inspection Service Wildlife Services, U.S. Fish and Wildlife Service, and the U.S. National Park Service to be used only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicators certification.

**ACCEPTED with COMMENTS**  
**In EPA Letter Dated**  
**IAN 26 2012**  
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 56228-37

**SUPPLEMENTAL LABELING**  
**BRODIFACOUM-25D CONSERVATION**

*For control and eradication of roof (black) rats on Desecheo Island, Puerto Rico.*

This supplemental label is only for use on Desecheo Island, Puerto Rico and expires on April 30, 2014 and must not be used or distributed after this date.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

(EPA REG. NO. 56228-37, EPA Est. No. 056228-ID-1)

THIS SUPPLEMENTAL LABELING AND THE PACKAGE LABELING FOR BRODIFACOUM-25D CONSERVATION (EPA REG. NO. 56228-37) MUST BE IN THE POSSESSION OF THE USER AT THE TIME OF APPLICATION. READ THIS SUPPLEMENTAL LABEL AND THE PACKAGE LABEL BEFORE APPLYING BRODIFACOUM-25D CONSERVATION. ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS ON THIS SUPPLEMENTAL LABEL AND ON THE PACKAGE LABEL MUST BE FOLLOWED.

**DIRECTIONS FOR USE**

**USE RESTRICTIONS:**

This supplemental label applies only to the control and eradication of roof (black) rats (*Rattus rattus*) or other invasive rodents on Desecheo Island. All modifications to EPA Reg. No. 56228-37 contained in this label apply only to the use of this product on Desecheo Island.

The maximum amount of bait to be applied by broadcast application under this label to Desecheo Island may not exceed 4,167 kilograms (~9,188 lbs). Determination of the final project broadcast application rate will be calculated from the total amount of bait applied via broadcast baiting to the emergent land area of Desecheo Island. In addition, a maximum of 697 kg (1535 lbs) of bait may be applied in bait stations under this label. In the event rats or rat sign are found after baiting operations, small scale hand broadcast applications are permitted in the area of the evidence in an effort to eliminate the few remaining survivors.

**DIRECTIONS FOR USE, continued:**

**BAIT STATIONS:** Tamper-resistant bait stations must be used when applying this product to areas in and around human habitation to keep bait out of reach of children, non-target wildlife, or domestic animals. Apply up to 16 ounces (454 grams) of bait per bait station. Space bait stations at intervals no greater than 160 ft (50 meters). Deploy bait stations in transects along exposed ridgelines. One bait station can be deployed in an abandoned concrete bunkers on the island. Check and replenish bait stations at least every 7 days for the first 6 weeks of the operation.

**BROADCAST APPLICATION:**

Broadcast bait using aerial (helicopter) or by gloved hand. Two aerial broadcast applications may be made during the initial eradication attempt. The first application is to be targeted at 18 kg/ha (16 lbs/acre). The second application is to be targeted at 9 kg/ha (8 lbs/acre). These rates are based on the amount of bait delivered on the ground given the 3-dimensional surface area of the island. The 3-dimensional surface are of Desecheo Island is approximately 13% larger than the planar (2-dimensional) area. Therefore, the bucket calibration (sowing) rate should be approximately 20 kg/ha and 10 kg/ha for the first and second applications, respectively. The second broadcast application should be timed to maximize the probability of baiting weanling rats that may emerge from the nest after the first application, but will also be dependent on local weather conditions. The same rates must be used for hand baiting. These application rates have been established to ensure that the entire land mass is treated with sufficient bait to present a minimum of one lethal dose for each rat present (in each potential rat territory), for long enough that rats can find and consume the bait (typically 3-4 days) and to account for substantial loss of bait to terrestrial crabs and other invertebrates, as well as degradation of bait over that time period.

**At points where flight lines overlap, the amount of bait applied might locally exceed the prescribed application rate. This could occur along adjacent borders of parallel swaths, at the end of swaths where they intercept the swaths created by shoreline baiting, or in areas missed during the initial baiting operations, as indicated by the GPS flight path data. Minimize areas where the allowable application rate is exceeded as much as possible while ensuring that all areas are baited sufficiently.**

If bait application is interrupted due to poor weather conditions , "back baiting" of previously baited swaths is permitted to ensure rats are exposed to the bait Use the following rules to determine the extent of back baiting.

<u>Application Delay</u>	<u>Resume baiting strategy</u>
1 day	At drop boundary
2-3 days	2-4 swath widths behind the drop boundary
≥ 3 days	4-6 swath widths behind the drop boundary

Do not make aerial (helicopter) applications in sustained winds higher than 35 mph (30 knots). Pilot in command has final authority for determining safe flying conditions.

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**DIRECTIONS FOR USE, continued:**

For all methods of baiting, monitor the baited area at least twice per week until 3 weeks have passed since the last broadcast application and, using gloves, collect and dispose of any dead animals and spilled or spoiled bait properly.

UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE  
4700 River Road, Unit 149  
Riverdale, MD 20737-1237