



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 12, 2019

David A. Bergsten
Assistant Chief
Environmental and Risk Analysis Services
Policy and Program Development
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
4700 River Road, Unit 149
Riverdale, MD 20737-1237

Subject: Label Amendment – Revision of respirator type requirement for loaders, updating application directions and baiting amounts, adding a container label, and other minor changes

Product Name: Brodifacoum-25D Conservation

EPA Registration Number: 56228-37

Application Date: 07/23/2019

Decision Number: 554211

Dear Mr. Bergsten:

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 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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false

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or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. 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 Paul Di Salvo by phone at 703-347-0322, or via email at disalvo.paul@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Paul Di Salvo" followed by a small flourish.

Meredith F. Laws, Branch Chief
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

RESTRICTED USE PESTICIDE

DUE TO HAZARDS TO NON-TARGET SPECIES

For retail sale only to employees of federal agencies responsible for wildlife management 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.

BRODIFACOUM-25D CONSERVATION

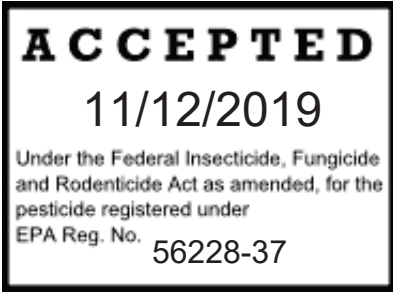
A pelleted rodenticide for control or eradication of invasive rodents in dry climates on islands or vessels for conservation purposes.

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

IF SWALLOWED:

- Call a physician or poison control center immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of soap and water for 15-20 minutes.
- Call a poison control center or doctor immediately for further treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor immediately for further treatment advice.

IF IN EYES:

- 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.
- Call a poison control center or doctor immediately for 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 K₁, 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 K₁.

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 must wear:

- Protective eyewear or face shield
- A minimum of a NIOSH-approved particulate filtering facepiece respirator with any N, R, or P filter; OR a NIOSH-approved elastomeric particulate respirator with any N, 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.

READ THIS LABEL: Read the entire label. 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

- **IMPORTANT: DO NOT** expose children, pets, or other non-target animals to rodenticides. Take all appropriate steps to limit exposure to and impacts on nontarget species, especially those for which special conservation efforts are planned or ongoing. To help prevent accidental exposures:
 - Keep children out of areas where this product is used or deny them access to bait by use of tamper resistant bait stations.
 - Store this product in a location out of reach of children, pets, livestock, and nontarget wildlife.
 - Apply bait only as specified on this label and in strict accordance with the **USE RESTRICTIONS** and **APPLICATION DIRECTIONS**.
 - Dispose of the product container and any unused, spoiled, or unconsumed bait as specified under **STORAGE AND DISPOSAL**.
- This product may be used only to control or eradicate Norway rats (*Rattus norvegicus*), roof rats (*Rattus rattus*), Polynesian rats (*Rattus exulans*), house mice (*Mus musculus*), or other types of invasive rodents on islands for conservation purposes, or on grounded vessels or vessels in peril of grounding.
- This product is to be used for the protection of State or Federally-listed Threatened or Endangered Species or other species determined to require special protection.
- **DO NOT** apply this product to food or feed.
- **DO NOT** reuse implements used for applying bait for food or feed use.
- Treated areas with public access must be posted with warning signs appropriate to the current rodent control or eradication operation.
- Broadcast applications are prohibited on vessels or in areas of human habitation.
- The pilot in command has final authority for determining safe flying conditions. Do not make aerial broadcast applications in sustained winds exceeding 35 mph (30 knots).

DIRECTIONS FOR USE, continued

APPLICATION DIRECTIONS

HAND BAITING APPLICATIONS:

Applicators may use the hand baiting methods at use sites for rats and mice as specified in Table 1.

Table 1.

Method	Use sites	Application rate	Additional baiting instructions
Tamper-resistant bait stations	<ul style="list-style-type: none"> All use sites allowed on this label. For canopy baiting: Follow the instructions below, as applicable, for Bait bolas (sachets) used for canopy baiting. 	<p><u>Rats:</u></p> <ul style="list-style-type: none"> 4.0-16.0 ounces (113.4-453.6 grams) per station or tray. Space stations or trays at intervals of approximately 16-82 feet (5-25 meters) in a grid over the area. Check and replenish stations or trays at least once every 7 days. <p><u>Mice:</u></p> <ul style="list-style-type: none"> 0.25-1.0 ounces (7.1-28.4 grams) per station or tray. Space stations or trays at intervals of approximately 10-65 feet (3-20 meters) in a grid over the area. Up to 3.0 ounces (85.1 grams) per station or tray may be needed at locations with high mouse activity. Check and replenish stations or trays at least once every 7 days. 	<ul style="list-style-type: none"> Where a continuous source of infestation is present, permanent bait stations may be established and bait replenished as needed.
Burrow baiting	<ul style="list-style-type: none"> Uninhabited non-crop areas 	<p><u>Rats:</u></p> <ul style="list-style-type: none"> 3.0-4.0 ounces (85.1-113.4 grams) per active burrow entrance. Flag treated burrows and inspect them frequently, daily if possible. Reapply bait if the bait has been removed. <p><u>Mice:</u></p> <ul style="list-style-type: none"> 0.25 ounces (7.1 grams) per active burrow entrance. Flag treated burrows and inspect them frequently, daily if possible. Reapply if the bait has been removed. 	<ul style="list-style-type: none"> Place bait within burrows in piles or within small bags 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. Place bait far enough into burrow so that it can barely be seen. Do not plug burrows.
Bait bolas (sachets)	<ul style="list-style-type: none"> Uninhabited grounded vessels or vessels in peril of grounding that are difficult or unsafe for applicators to enter. Canopy of trees and shrubs in non-crop areas where sufficient food and cover are available to harbor populations of rodents in canopies of trees and shrubs. 	<p><u>Rats:</u></p> <ul style="list-style-type: none"> 4.0-16.0 ounces (113.4-453.6 grams) per small bag made of rodent accessible material. Space bolas at intervals of approximately 16-82 feet (5-25 meters) in a grid over the area. Check at least every 7-14 days and reapply if the bait has been removed. <p><u>Mice:</u></p> <ul style="list-style-type: none"> 0.25-1.0 ounces (7.1-28.4 grams) per small bag made of rodent accessible material. Space bolas at intervals of approximately 10-65 feet (3-20 meters) in a grid over the area. Up to 3.0 ounces (85.1 grams) per bag may be needed at locations with high mouse activity. Check at least every 7-14 days and reapply if the bait has been removed. <p><u>Canopy baiting:</u></p> <ul style="list-style-type: none"> 4.0-16.0 ounces (113.4-453.6 grams) per small bag made of rodent accessible material. Place bolas in the canopy at intervals of ≤ 160 feet (≤ 49 meters). If possible, check at least every 7-14 days and reapply if the bait has been removed. 	<ul style="list-style-type: none"> Bait bolas should be knotted or otherwise sealed to avoid spillage. 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. Throw or drop bolas into areas that are unsafe for applicators to enter. Place bolas in the canopy of trees or shrubs by hand or use long poles (or other devices). Bolas may be fitted with line or string to ensure canopy entanglement.

DIRECTIONS FOR USE, continued

APPLICATION DIRECTIONS, continued

BROADCAST APPLICATIONS:

Broadcast applications are prohibited on vessels or in areas of human habitation. Set the application rate according to the extent of the infestation and apparent population density. For eradication operations, treat entire land masses.

Broadcast bait using aircraft, ground-based mechanical equipment, or by gloved hand at a rate no greater than 16 lbs of bait per acre (18 kg bait/hectare) per application. Make a second broadcast application, typically 5 to 7 days after the first application, depending on local weather conditions, at a rate no higher than 8 lbs of bait per acre (9 kg bait/hectare). In situations where weather or logistics only allow one bait application, a single application may be made at a rate no higher than 16 lbs bait per acre (18 kg bait/hectare).

Assess baited areas for signs of residual rodent activity after the last broadcast application (typically 7 to 10 days post-treatment).

If rodent activity persists, conduct hand baiting applications as specified in Table 1 in areas where rodents remain active. If the terrain does not permit use of hand baiting methods, continue with broadcast baiting, limiting such treatments to areas where active signs of rodents are seen. Maintain treatments for as long as rodent activity is evident in the area and rodents appear to be accepting bait.

POSTTREATMENT CLEAN-UP

For all methods of baiting, monitor the baited area periodically for carcasses during and after the operation, if possible. Using gloves, collect and dispose of any carcasses in accordance with federal, state, and local regulations. Carcasses do not need to be collected in areas where non-target animals have naturally high mortality rates and collecting and disposing of carcasses is impractical (e.g., some bird breeding areas).

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 bolas applied in grounded vessels, vessels in peril of grounding, 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: 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.

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

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TOTAL: 100.0000%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

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 must wear:

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: NOTE: This is the container label. See the enclosed full product label for **Brodifacoum-25D Conservation** (EPA Reg. No. 56228-37) for complete **DIRECTIONS FOR USE** and all other label and use information. Read the entire label. 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. **A copy of the full product label must be in the possession of the user at the time that the product is applied.**

STORAGE AND DISPOSAL

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

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