



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 10, 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 – Extend the expiration date of the previous supplemental label for use on Midway Atoll project  
Product Name: Brodifacoum-25D Conservation  
EPA Registration Number: 56228-37  
Application Date: May 20, 2021  
Decision Number: 578034

Dear Mr. 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 house mice must be killed. To achieve this goal, the eradication program involves multiple application methods, including aerial broadcast, bait stations, bait trays, bait bolas, 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 house mice 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, 2025.** 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 703-347-8750, 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: 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.

## SUPPLEMENTAL LABELING BRODIFACOUM-25D CONSERVATION

EPA Reg. No. 56228-37

*For control and eradication of house mice (*Mus musculus*) on Midway Atoll National Wildlife Refuge's Sand Island.*

**This supplemental label is only for use on Midway Atoll National Wildlife Refuge's Sand Island, and expires on December 31, 2025.**

## 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.

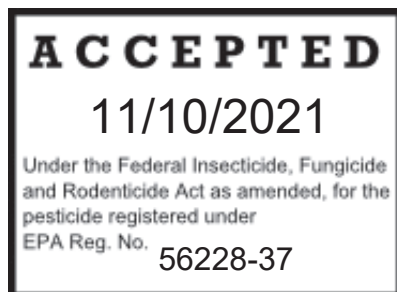
#### IF IN EYES:

- 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 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.

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

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### CAUTION

Keep away from humans, domestic animals, and pets. If swallowed, this material may reduce the clotting ability of blood and cause bleeding. Wear protective gloves when applying or loading bait. With detergent and hot water, wash all implements used for applying bait. Do not use these implements for mixing, holding, or transferring food or feed.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Gloves
- Shoes plus socks

For aerial applications, 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 (TC-84A); or an elastomeric NIOSH approved particulate respirator with any N, R, or P filter (TC-84A); or a NIOSH approved powered air purifying respirator with an HE filter (TC-21C).

#### ENVIRONMENTAL HAZARDS

This product is 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.

### DIRECTIONS FOR USE

**It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Misuse may result in civil or criminal enforcement action. A copy of this supplemental labeling and the container 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 LABEL:** Read this supplemental label and the container label before applying Brodifacoum-25D Conservation.

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 of Brodifacoum-25D Conservation according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the container for Brodifacoum-25D Conservation.

#### USE RESTRICTIONS:

This supplemental label applies only to the control and eradication of house mice (*Mus musculus*) on Midway Atoll National Wildlife Refuge's Sand Island. All modifications to EPA Reg. No. 56228-37 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 Midway Atoll National Wildlife Refuge's Sand Island may not exceed 214.0 lbs/acre (239.9 kg/ha) under this supplemental label. This maximum application rate may be locally exceeded along adjacent borders of parallel swaths, where shoreline or other perimeter swaths overlap the ends of interior swaths, in the coastal/interior overlap zone, or adjacent to areas missed during the initial baiting operations and subsequently reapplied. Applicators should minimize areas where the allowable application rate is exceeded as much as possible while ensuring that all areas are baited sufficiently.**

**The total amount of bait applied by broadcast applications under this label to Midway Atoll National Wildlife Refuge's Sand Island may not exceed 252,250 lbs (114,419 kg).**

**In the event that mice (or mouse sign) are found after baiting operations, additional small-scale hand spot baiting or hand broadcast applications are permitted in the area where the mice or mouse sign was found in an effort to eliminate the few remaining survivors.**

**Applicators shall not make aerial (helicopter) 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 SPOT BAITING:

##### Bait Stations:

Enclosed bait stations (either tubes or bait boxes with lids) may be used when applying this product to uninhabited non-crop areas, uninhabited or abandoned structures, employee residences or housing, kitchens and cafeterias, and to institutional structures, including office buildings, workshops, utility buildings, supply sheds, and recreational buildings. Bait stations may also be used within greenhouses, hydroponic gardens, garden plots, in or around residences, on ocean piers or ramps, and around the perimeter of fresh water tanks, seeps, pools, and ponds.

The following conditions apply:

- Apply approximately 1.0 ounces (28.4 grams) of bait per placement. Space placements at intervals of 6.0 feet (1.8 meters) or greater. Larger placements, up to 3.0 ounces (85.1 grams) may be needed in areas of very high mouse activity. Check and replenish bait trays at least once every 7 days during the operation.
- Bait stations must be used when applying bait within occupied employee residences or housing, and in kitchens and cafeterias.

##### Bait Trays and Bait Bolas:

Bait trays with an open top that exposes bait or bait bolas (sachets of bait held within rodent accessible material) may be used when applying this product to uninhabited non-crop areas, and within or around uninhabited or abandoned structures, unoccupied employee residences or housing, and institutional structures, including office buildings, workshops, utility buildings, supply sheds, and recreational buildings. Bait trays may also be used within and around greenhouses, hydroponic gardens, and garden plots, ocean piers or ramps, and around the perimeter of fresh water tanks, seeps, pools, and ponds.

The following conditions apply:

- Apply approximately 1.0 ounces (28.4 grams) of bait per placement. Space placements at intervals of 6.0 feet (1.8 meters) or greater. Larger placements, up to 3.0 ounces (85.1 grams) may be needed in areas of very high mouse activity. Check and replenish bait trays at least once every 7 days during the operation.
- Bait bolas may be thrown into abandoned buildings and parts of buildings or other infrastructure that are unsafe to enter.
- Bait bolas may be placed in utility boxes and dropped into subterranean infrastructure such as sewer, water, and electrical infrastructure, and any other underground space through any access points.
- Bait bolas may be reapplied every 7-12 days or sooner if it is possible to visibly verify the bait has been removed.

### BROADCAST APPLICATIONS:

#### Hand Broadcast:

Up to three hand broadcast applications may be made during the operation. For two applications, the interval between applications will ideally be spaced approximately 14-30 days apart. However, depending on local weather conditions or other logistical considerations, these applications may occur anytime between 12 and 32 days. For three applications, the interval between applications will ideally be approximately 7-12 days, but depending on local weather conditions or other logistical considerations, may occur anytime between 5 and 14 days.

For each application:

- Apply at a rate up to 71.3 lbs/acre (79.9 kg/ha) to the coastal perimeter of the island, avoiding the water's edge.
- Apply at a rate up to 71.3 lbs/acre (79.9 kg/ha) to uninhabited non-crop areas within the interior of the island, within and around uninhabited or abandoned structures, and around the perimeter of employee residences or housing, institutional structures, greenhouses, hydroponic gardens, garden plots and pots, and fresh water tanks, seeps, pools, and ponds.
  - Before making hand broadcast applications, cover or dismantle garden plots and pots, and cover fresh water open top tanks, unburied seeps, open pools, and open ponds. Covers must prevent accumulation of bait in these areas and/or allow for removal of bait accumulated on covers. If fresh water open top tanks, unburied seeps, open pools, or open ponds cannot be adequately covered, do not hand broadcast bait within 3.3 feet (1.0 meter) of the water's edge.
- The maximum broadcast application rates may be locally exceeded when applying along edges of areas missed or excluded during aerial broadcast applications. Applicators should minimize areas where the allowable application rate is exceeded as much as possible while ensuring that all areas are baited sufficiently.

## DIRECTIONS FOR USE, continued:

### APPLICATION DIRECTIONS, continued:

#### BROADCAST APPLICATIONS, continued:

##### Aerial Broadcast:

Up to three aerial broadcast applications may be made during the operation. For two applications, the interval between applications will ideally be spaced approximately 14-30 days apart. However, depending on local weather conditions or other logistical considerations, these applications may occur anytime between 12 and 32 days. For three applications, the interval between applications will ideally be approximately 7-12 days, but depending on local weather conditions or other logistical considerations, may occur anytime between 5 and 14 days. If an aerial broadcast application is interrupted due to poor weather conditions or other logistical considerations, the remainder of the application will be completed within the next 5-7 days, and "back baiting" of previously baited swaths is permitted.

For each application:

- Apply at a rate of no more than 71.3 lbs/acre (79.9 kg/ha) when applying to the coastal zone of the island. The coastal zone is considered to be anywhere within 16.4 feet (5 meters) of the water's edge.
  - When applying within the coastal zone, use a deflector that directs bait away from the water's edge or an aerial broadcast bucket able to do a swath width of approximately 32.8 feet (10 meters) or less.
- Apply at a rate of no more than 71.3 lbs/acre (79.9 kg/ha) to the interior of the island over uninhabited non-crop areas, uninhabited, abandoned, unused, and institutional structures, employee residences or housing, food-producing greenhouses, hydroponic gardens, garden plots or pots, and fresh water tanks, seeps, pools, and ponds.
  - Before making aerial broadcast applications, cover or dismantle food producing greenhouses, hydroponic gardens, and garden plots and pots, and cover fresh water open top tanks, unburied seeps, open pools, and open ponds. Covers must prevent accumulation of bait in these areas and/or allow for removal of bait accumulated on covers. If fresh water open top tanks, unburied seeps, open pools, or open ponds cannot be adequately covered, do not aeriaily broadcast bait within 16.4 feet (5 meters) of the water's edge.
- An additional swath of bait targeting the coastal/interior overlap zone may be applied at a rate of no more than 35.7lbs/acre (40 kg/ha).
- At points where flight lines overlap, the amount of bait applied may exceed the maximum broadcast application rates. This will occur in the coastal/interior overlap zone, and could also occur along adjacent borders of parallel 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 application rate exceeds 71.3 lbs/acre (79.9 kg/ha) as much as possible while ensuring that all areas are baited sufficiently.

### POSTTREATMENT CLEAN-UP:

Using gloves, collect and dispose of any accidentally spilled bait.

Using gloves, collect and dispose of bait trays, bait bolas, and bait stations at the end of eradication activities conducted under this supplemental labeling.

Bait bolas thrown into abandoned buildings, subterranean infrastructure, and in parts of buildings or other infrastructure that are unsafe to enter 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, which 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. Offer for recycling, if available. Otherwise, dispose of empty container in a sanitary landfill or by incineration.

**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.