



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 30, 2024

Sarah Allely
Acting Assistant Chief
Environmental and Risk Analysis Services
USDA APHIS
4700 River Road
Riverdale, MD 20737

Subject: Amendment to Add a Supplemental Label – Brodifacoum-25D Conservation
(Reg. No. 56228-37) for black rat eradication on Savana Island in the U.S. Virgin Islands.
Product Name: Brodifacoum-25D Conservation
EPA Registration Number: 56228-37
Application Date: 10/4/2023
Case Number: 491064

Dear Sarah Allely,

The supplemental 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.

The eradication effort is a cooperative program among the Island Conservation (IC), USDOJ, USDA-APHIS Wildlife Services (WS) and US Virgin Island Dept of Planning and Nat Res (USVI DPNR) on Savana Island, which is a small, uninhabited island west of St. Thomas Island that is managed by the U.S. Virgin Islands' government as a wildlife sanctuary. The USVI DPNR and IC are working cooperatively with the U.S. Fish and Wildlife Service (USFWS) and the North Carolina Zoo to introduce the endangered Virgin Islands tree boa (*Chilabothrus granti*: VI boa), *Chilabothrus granti*, on Savana Island. Removal of black rats from the island is critical to the successful introduction and further recovery of the VI boa.

This supplemental label approves the use of Brodifacoum-25D Conservation (Reg. No. 56228-37) to eradicate black rats on Savana Island. The supplemental label is only for use on Savana Island and expires on December 31, 2029. The action plan involves both aerial and ground-based application of rodenticide over the entire island. While effort will be made to specifically target invasive rats, the scope of the application may result in some risk to non-target species. However, the benefits of the long-term goal of removing rats from the island to restore Savana's ecosystem and to recover the endangered VI boa are believed to be justified and to outweigh this potential risk.

EPA has considered the effects of the 56228-37 supplemental label on the listed species and designated critical habitat in the action area given the previous informal consultation between the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) and the National Marine Fisheries Services (NMFS) on actions under this end-use product. Based on that previous consultation, EPA is making the same effects determinations as APHIS because the scope of EPA's FIFRA action—approving the supplemental label—corresponds to the scope of the action that APHIS informally consulted upon (and with which NMFS previously concurred).

Therefore, EPA made a may affect, but is not likely to adversely affect (NLAA) determination for the following listed species within the action area for this project:

Sea Turtles

- Green turtle Atlantic [NA] and South Atlantic [SA] distinct population segment [DPS] (*Chelonia mydas*)
- Hawksbill sea turtle (*Eretmochelys imbricate*)
- Loggerhead sea turtle (Northwest Atlantic [NWA] DPS) (*Caretta caretta*)
- Leatherback sea turtle (*Dermochelys coriacea*)
- Kemp's Ridley sea turtle (*Lepidochelys kempii*)

Fish

- Scalloped hammerhead shark (Central and Southwest Atlantic DPS) (*Sphyrna lewini*)
- Giant manta ray (*Manta birostris*)
- Nassau grouper (*Epinephelus striatus*)

Invertebrates and Marine Plant

- Elkhorn coral (*Acropora palmata*)
- Staghorn coral (*Acropora cervicornis*)
- Boulder star coral (*Orbicella franksi*)
- Mountainous star coral (*Orbicella faveolata*)
- Lobed star coral (*Orbicella annularis*)
- Rough cactus coral (*Mycetophyllia ferox*)
- Pillar coral (*Dendrogyra cylindrus*)
- Queen Conch (*Aliger gigas*)

Marine Mammals

- North Atlantic right whale (*Eubalaena glacialis*)
- Blue whale (*Balaenoptera musculus*)
- Fin whale (*Balaenoptera physalus*)
- Sei whale (*Balaenoptera borealis*)
- Sperm whale (*Physeter macrocephalus*)
- Rice's whale (*Balaenoptera ricei*)

Additionally, EPA made a may affect, but is not likely to adversely affect (NLAA) determination for designated critical habitat for the Elkhorn coral, Staghorn coral, Boulder star coral, Mountainous star coral, Lobed star coral, Rough cactus coral, or Nassau grouper. NMFS concurred with all EPA's NLAA determinations on August 21st, 2024, thus completing EPA's consultation process for this action.

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. 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 Cassandra Luna by phone at (202)-255-1237, or via email at Luna.Cassandra@epa.gov.

Sincerely,



Digitally signed by
Melissa Bridges
Date: 2024.09.30
08:49:31 -04'00'

Melissa Bridges, Product Manager 7
Invertebrate and Vertebrate Branch 3
Registration Division (7505T)
Office of Pesticide Programs

Enclosure—Stamped Supplemental Label

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-25D CONSERVATION

EPA Reg. No. 56228-37

For control and eradication of black rats on Savana Island, St. Thomas U.S Virgin Islands

This supplemental label is only for use on Savana Island and expires on December 31, 2029.

ACTIVE INGREDIENT:

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

OTHER INGREDIENTS:99.9975%

TOTAL:100.0000%

ACCEPTED

09/30/2024

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 56228-37

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If swallowed	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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 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 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 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-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 main label for Brodifacoum-25D 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 invasive rodents on Savana 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 broadcast application to Savana Island may not exceed 53.53 lb/acre (60 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. **No more than 6,703 kg (14,777.6 lb) can be applied to Savana Island.**

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">All non-crop areas on islands, including canopies of trees and shrubs and subterranean spaces	<ul style="list-style-type: none">4–16 ounces (113–454 grams) per bait stationSpace bait stations at intervals of approximately 16–82 feet (5–25 meters) in a grid over the areaCheck and replenish bait stations at least once every 7–21 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.
Bait trays and bait sachets	<ul style="list-style-type: none">All non-crop areas on islands, including canopies of trees and shrubs and subterranean spaces	<ul style="list-style-type: none">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.Space bait trays, sachets, or bolas at intervals of approximately 16–82 feet (5–25 meters) or more in a grid over the areaCheck and replenish bait stations at least once every 7–21 days	<ul style="list-style-type: none">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.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 uncrewed aerial vehicles (UAV) may be used to apply sachets.Where a continuous source of infestation is present, permanent bait trays may be established and bait replenished as needed.

BROADCAST APPLICATIONS:

Up to two broadcast applications at a rate of up to 26.76 lb/acre (30 kg/ha) of bait per application may be made to Savana Island during the primary eradication effort as specified in Table 2. Each broadcast application 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. This ensures that rats migrating into the treated site following the interruption are exposed to sufficient bait.

For the two primary broadcast applications, the ideal interval between applications is approximately 24 days. However, if the first broadcast application is interrupted due to weather conditions or other logistical considerations, the second broadcast application may occur anytime between 14 and 28 days from the day that the first bait application was initiated depending on local weather conditions.

DIRECTIONS FOR USE, continued

APPLICATION DIRECTIONS, continued

BROADCAST APPLICATIONS, continued:

Table 2.

Broadcast application method	Use sites	Additional baiting instructions
Hand broadcast (hand, scoop, or ground broadcast equipment)	<ul style="list-style-type: none">All non-crop areas	<ul style="list-style-type: none">Do not broadcast bait in coastal areas or brackish inland wetlands below the mean high tide water mark.
Aerial broadcast (helicopter or unmanned aerial vehicles (UAV))	<ul style="list-style-type: none">All non-crop areas	<ul style="list-style-type: none">Do not broadcast bait in coastal areas or brackish inland wetlands below the mean high tide water mark.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 26.76 lb/acre (30 kg/ha) above the mean high tide water mark.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 mean high tide water mark. Alternately, trickle baiting (narrow width bucket) baiting by UAV or manned helicopter may be used.At points where aerially broadcast bait swaths or hand broadcast areas overlap, the amount of bait applied may locally 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 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 rodent activity persists following the eradication effort, conduct hand baiting applications as specified in Table 1. Maintain hand baiting or hand broadcast treatments up to 26.76 lb/acre (30 kg/ha) in limited areas where continuing rat activity is evident 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 12 months following the primary broadcast application.

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, sachets, and trays applied in canopies, 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.