



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 8, 2018

Andrej Branc
PelGar International
215 Evergreen Ct.
Saylorsburg, PA 18353

Subject: PRIA Label and CSF Amendment – To revise the Basic CSF for a slight change in the bait formulation, and to make minor revisions to the labeling
Product Name: Brigand SB Soft Bait Rodenticide
EPA Registration Number: 87235-1
Application Date: October 12, 2017
Decision Number: 534750

Dear Mr. Branc:

The amended label and CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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.

Please note that the record for this product currently contains the following CSF:

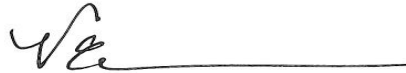
- Basic CSF dated 10/12/17

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 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.

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EPA Reg. No. 87235-1
Decision No. 534750

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 Gene Benbow by phone at 703-347-0235, or via email at Benbow.Gene@epa.gov.

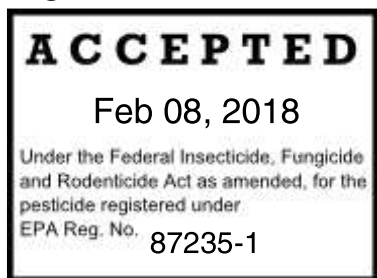
Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure: Stamped label

[Large Transport Container Label – Front Panel]



**BRIGAND SB
Soft Bait Rodenticide**

ACTIVE INGREDIENT:
 Bromadiolone (CAS #28772-56-7):.....0.005%
 OTHER INGREDIENTS*:..... 99.995%
 Total 100.000%

*Contains Denatonium Benzoate

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or when going for treatment.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
If in the 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, doctor, or 1-800-222-1222 immediately for treatment advice.

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. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Personal Protective Equipment (PPE)

All handlers (including applicators) must wear shoes, socks, long pants and water-proof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying 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 fish, birds and other wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. Do not apply this product directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions

Net Weight:

Manufactured by:

PelGar International Ltd.

Unit 13 Newman Lane

Alton, Hampshire GU34 2QR, UK

EPA Reg. No. 87235-1

EPA Est. No. 87235-GBR-001

Imported by:

PelGar USA

Saylorsburg, PA

1-610-849-1723

[PCO Outer Container Label – Front Panel]

BRIGAND SB
Soft Bait Rodenticide

KILLS RATS, MICE AND MEADOW VOLES*
KILLS WARFARIN RESISTANT NORWAY RATS

ACTIVE INGREDIENT:	
Bromadiolone (CAS #28772-56-7):.....	0.005%
OTHER INGREDIENTS*:.....	<u>99.995%</u>
Total	100.000%

*Contains Denatonium Benzoate

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back Panel for additional precautionary labeling.

*Not permitted for use against the following in California: Cotton rat, Eastern harvest mouse, Golden mouse, Meadow vole, Mexican woodrat, Polynesian rat, Southern plains woodrat, and White throated woodrat

Net Weight: 16 lbs, 18lbs or 20lbs
Manufactured by:
PelGar International Ltd.
Unit 13 Newman Lane
Alton, Hampshire GU34 2QR, UK
EPA Reg. No. 87235-1
EPA Est. No. 87235-GBR-001

Imported by:
PelGar USA
Saylorsburg, PA
1-610-849-1723

[PCO Outer Container Label – Side/Back Panel]

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Personal Protective Equipment (PPE)

All handlers (including applicators) must wear shoes, socks, long pants and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements:

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

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 this entire label and follow all use directions and use precautions. Use only for the sites, pests, and application methods described on this label.

IMPORTANT: Do not expose children, pets, or non-target animals to rodenticides. To help to prevent accidents:

1. Store unused product out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and non-target wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from bait stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled, or unconsumed bait as specified on this label.

Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait.

USE RESTRICTIONS

This product can only be used to control Norway rats (*Rattus norvegicus*), Roof rats (*Rattus rattus*), House mice (*Mus musculus*), Cotton rat* (*Sigmodon hispidus*), Eastern harvest mouse* (*Reithrodontomys humuli*), Golden mouse* (*Ochrotomys nuttalli*), Meadow vole* (*Microtus pennsylvanicus*), Mexican woodrat* (*Neotoma Mexicana*), Polynesian rat* (*Rattus exulans*), Southern plains woodrat* (*Neotoma micropus*) and

White throated woodrat* (*Neotoma albugula*) in and around 100 feet of man-made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations. Examples of such structures include homes and other permanent or temporary residences, food processing facilities, industrial and commercial buildings, trash receptacles, agricultural and public buildings, transport vehicles (ships, trains, aircraft), docks and port of terminal buildings and related structures around and associated with these sites. Fence and perimeter baiting, beyond 100 feet from a structure as defined above, is prohibited. This product must not be applied directly to food or feed crops. Do not broadcast bait. Burrow baiting with Brigand Soft Bait is prohibited.

Do not sell this product in individual containers holding less than 16 pounds of bait.

*Not permitted for use against the following in California: Cotton rat, Eastern harvest mouse, Golden mouse, Meadow vole, Mexican woodrat, Polynesian rat, Southern plains woodrat, and White throated woodrat.

SELECTION OF TREATMENT AREAS: Determine areas where rats, mice or meadow voles* will most likely find and consume the bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places, between floors and walls, or in locations where signs of rats, mice or meadow voles have been seen. Protect bait from rain and snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS: Each bag of **Brigand Soft Bait** contains approximately 0.35 ounces (10.00 grams) of bait.

RATS: Apply 10 to 42 bait bags per placement for controlling rats. Space placements 15 to 30 feet apart at appropriate locations within the infested area. Maintain a continuous supply of fresh bait for at least 10 days or until signs of new feeding by rats on bait cease to appear.

MICE & MEADOW VOLES*: Apply 1 bait bag per placement, usually spaced 8 to 12 feet apart. Two bags may be needed at points of very high mouse or meadow vole* activity. Maintain a constant supply of fresh bait for 15 days or until signs of mouse and meadow vole* activity cease.

Follow-up: Replace contaminated or spoiled bait immediately. Wearing waterproof gloves, collect and properly dispose of dead animals and leftover bait and bait bags, as well as any bait that has become accessible to non-target animals. To discourage re-infestation, limit sources of rodent food, water, and harborage as much as possible. If re-infestation does occur, repeat treatment. For continuous sources of infestation, set up permanent bait stations and replenish them as needed.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish, birds and other wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. Do not apply this product directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals.

Pesticide Disposal: Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or incineration.

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or when going for treatment.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, doctor, or 1-800-222-1222 immediately for 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, doctor, or 1-800-222-1222 immediately for treatment advice.

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. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

[Brigand SB - Agricultural Building Use Outer Container Label – Front Panel]

Brigand SB – Agricultural Building Use

For Use In and Around Agricultural Buildings Only

FOR INDOOR AND OUTDOOR USE

KILLS RATS, MICE AND MEADOW VOLES*

KILLS WARFARIN RESISTANT NORWAY RATS

ACTIVE INGREDIENT:

Bromadiolone (CAS #28772-56-7):.....0.005%

OTHER INGREDIENTS*:..... 99.995%

Total 100.000%

*Contains Denatonium Benzoate

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for additional precautionary labeling.

*Not permitted for use against the following in California: Cotton rat, Eastern harvest mouse, Golden mouse, Meadow vole, Mexican woodrat, Polynesian rat, Southern plains woodrat, and White throated woodrat

Net Weight: 8 lbs (2 pails X 4 lbs each) or 8 pounds up to 22 pounds

Statement required on label of inner packages holding less than 8 pounds of bait:

It is illegal to sell this product in individual containers holding less than 8 pounds of bait.

Manufactured by:

PelGar International Ltd.

Unit 13 Newman Lane

Alton, Hampshire GU34 2QR, UK

EPA Reg. No. 87235-1

EPA Est. No. 87235-GBR-001

Imported by:

PelGar USA

Saylorsburg, PA

1-610-849-1723

[Brigand SB - Agricultural Building Use Outer Container Label – Side/Back Panel]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Keep away from children, domestic animals and pets. Do not get in eyes, on skin, or on clothing.

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 this entire label and follow all use directions and use precautions. Use only for the sites, pests, and application methods described on this label.

IMPORTANT: Do not expose children, pets, or non-target animals to rodenticides. To help to prevent accidents:

1. Store unused product out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and non-target wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from bait stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled, or unconsumed bait as specified on this label.

Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait.

USE RESTRICTIONS

This product can only be used to control Norway rats (*Rattus norvegicus*), Roof rats (*Rattus rattus*), House mice (*Mus musculus*), Cotton rat* (*Sigmodon hispidus*), Eastern harvest mouse* (*Reithrodontomys humuli*), Golden mouse* (*Ochrotomys nuttalli*), Meadow vole* (*Microtus pennsylvanicus*), Mexican woodrat* (*Neotoma Mexicana*), Polynesian rat* (*Rattus exulans*), Southern plains woodrat* (*Neotoma micropus*) and White throated woodrat* (*Neotoma albugula*) in and around 100 feet of agricultural buildings and man-made agricultural structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations. Fence and perimeter baiting, beyond 100 feet from an agricultural structure as defined above, is prohibited. This product must not be applied directly to food or feed crops. Do not broadcast bait. Burrow baiting with Brigand Soft Bait is prohibited.

Do not sell this product in individual containers holding less than 8 pounds of bait.

*Not permitted for use against the following in California: Cotton rat, Eastern harvest mouse, Golden mouse, Meadow vole, Mexican woodrat, Polynesian rat, Southern plains woodrat, and White throated woodrat.

SELECTION OF TREATMENT AREAS: Determine areas where rats, mice and meadow voles* will most likely find and consume the bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places, between floors and walls, or in locations where signs of rats or house mice have been seen. Protect bait from rain and snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS: Each bag of **Brigand Soft Bait** contains approximately 0.35 ounces (10.00 grams) of bait.

RATS: Apply 10 to 42 bait bags per placement for controlling rats. Space placements 15 to 30 feet apart at appropriate locations within the infested area. Maintain a continuous supply of fresh bait for at least 10 days or until signs of new feeding by rats on bait cease to appear.

MICE & MEADOW VOLES*: Apply 1 bait bag per placement, usually spaced 8 to 12 feet apart. Two bags may be needed at points of very high mouse or meadow vole* activity. Maintain a constant supply of fresh bait for 15 days or until signs of mouse and meadow vole* activity cease.

Follow-up: Replace contaminated or spoiled bait immediately. Wearing waterproof gloves, collect and properly dispose of dead animals and leftover bait and bait bags, as well as any bait that has become accessible to non-target animals. To discourage re-infestation, limit sources of rodent food, water, and harborage as much as possible. If re-infestation does occur, repeat treatment. For continuous sources of infestation, set up permanent bait stations and replenish them as needed.

Personal Protective Equipment (PPE)

All handlers (including applicators) must wear shoes, socks, long pants and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements
 Follow manufacturer’s instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or when going for treatment.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, doctor, or 1-800-222-1222 immediately for 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, doctor, or 1-800-222-1222 immediately for treatment advice.
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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. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. Do not apply this product directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals.

Pesticide Disposal: Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or incineration.

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

[Bait Bag Label]
BRIGAND SB
ACTIVE INGREDIENT: Bromadiolone....0.005%
CAUTION: KEEP OUT OF REACH OF CHILDREN See outer container for complete directions for use and precautionary statements.
IT IS ILLEGAL TO SELL OR DISTRIBUTE THESE BAIT BAGS INDIVIDUALLY.
Net Weight: 0.35 ounces (10.00 grams)
EPA Reg. No. 87235-1 EPA Est. No. 87235-GBR-001