



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 16, 2017

Jim Warren
USDA APHIS
Environmental and Risk Analysis Services, Unit 149
4700 River Road
Riverdale, MD 20737

Subject: Label Amendment – To update the first aid and PPE language, address, and other minor revisions
Product Name: Brodifacoum 25W Conservation
EPA Registration Number: 56228-36
Application Date: August 3, 2017
Decision Number: 532254

Dear Dr. 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 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.

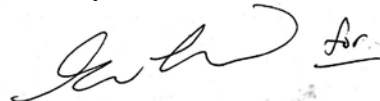
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or 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 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 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 'M. Laws', with a stylized flourish at the end.

Meredith F. Laws, Chief
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.

BRODIFACOUM-25W CONSERVATION

PELLETED RODENTICIDE BAIT FOR CONSERVATION PURPOSES

For control or eradication of invasive rodents in wet 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%

ACCEPTED

10/16/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 56228-36

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 K₁, intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals, and pets. If swallowed, this material may reduce the clotting ability of the 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 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 (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.

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: _____

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 label must be in the possession of the user at the time that the product is applied.

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. To help prevent accidents:
 - 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 locations out of reach of children, pets, and other nontarget animals.
 - Apply bait only according to the directions authorized.
 - Dispose of product container and unused, spoiled, or unconsumed bait as specified in the **"STORAGE AND DISPOSAL"** section.
- This product may be used 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 may be applied using bait stations, burrow baiting, canopy baiting or by aerial and ground broadcast application techniques.
- 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.
- Treated areas must be posted with warning signs appropriate to the current rodent control project.

BAIT APPLICATION

BAIT STATIONS: Tamper-resistant bait stations must be used when applying this product to grounded vessels or vessels in peril of grounding, or when used in areas of human habitation. Bait must be applied in locations out of reach of children, non-target wildlife, or domestic animals, or in tamper-resistant bait stations.

TO BAIT RATS: Apply 4 to 16 ounces (113 to 454 grams) of bait per placement. Space placements at intervals of 16 to 160 ft (about 5 to 50 meters).

TO BAIT MICE: Apply 0.25 to 0.5 ounces (7 to 14 grams) of bait per placement. Space placements at intervals of 6 to 12 ft (about 2 to 4 meters). Larger placements, up to 2 ounces (57 grams) may be needed at points of very high mouse activity.

FOR BOTH RAT AND MOUSE BAITING: Placements should be made in a grid over the area for which rodent control is desired. Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of rodent activity cease. Where a continuous source of infestation is present, permanent bait stations may be established and bait replenished as needed.

BURROW-BAITING: Place bait in burrows only if this can be done in a way that minimizes potential for ejection of bait and exposure of bait to non-target species.

TO BAIT RATS: Place 3 to 4 ounces (85 to 113 grams) of bait inside each burrow entrance.

TO BAIT MICE: Place approximately 0.25 ounces (7 grams) of bait in each active burrow.

FOR BOTH RAT AND MOUSE BAITING: Flag treated burrows and inspect them frequently, daily if possible. Maintain an uninterrupted supply of bait for at least 15 days or until rodent activity ceases.

CANOPY BAITING (bait placement in the canopy of trees and shrubs): In areas where sufficient food and cover are available to harbor populations of rodents in canopies of trees and shrubs, canopy baiting should be included in the baiting strategy. Approximately 4 to 7 ounces (113 to 200 grams) of bait should be placed in a cloth or resealable plastic bag. The bags should be knotted or otherwise sealed to avoid spillage and holes should be made in plastic bags to allow the bait odor to escape. Using long poles (or other devices) or by hand, bait filled bags should be placed in the canopy of trees or shrubs. Bait should be placed in the canopy at intervals of 160 ft (about 50 meters) or less, depending upon the level of rodent infestation in these habitats. In some vegetation types, bait stations may need to be used to ensure bait will stay in the canopy.

BROADCAST APPLICATION: 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).

Aerial (helicopter) applications may not be made in winds higher than 35 mph (30 knots). Pilot in command has final authority for determining safe flying conditions. However, aerial applications will be terminated when the following conditions are present:

- Windspeed in excess of 29 mph (25 knots) with an evaluation of the terrain and impact of the wind conditions, and not to exceed a steady wind velocity of 35 mph (30 knots).

Assess baited areas for signs of residual rodent activity (typically 7 to 10 days post-treatment). If rodent activity persists, set up and maintain tamper-resistant bait stations or apply bait directly to rodent burrows in areas where rodents remain active. If terrain does not permit use of bait stations or burrow baiting, 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 and, using gloves, collect and dispose of any dead animals and spilled bait properly.

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.