



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

February 27, 2017

Diane S. Sinkowski
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Subject: Label Amendment – To add a state restriction for Ohio to the label
Product Name: Sodium Fluoroacetate (Compound 1080) Livestock Protection Collar
EPA Registration Number: 56228-22
Application Date: November 10, 2016
Decision Number: 523757

Dear Ms. Sinkowski:

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 be 'MS' with a large loop and a horizontal line extending to the right.

Mark Suarez
Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

<p>PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS</p> <p>DANGER</p> <p>Fatal if swallowed. Wear waterproof gloves when handling collars. Wash hands after handling collars or animals that have been contaminated with 1080 solution. Do not use contaminated animals for food or feed.</p> <p>Environmental Hazards</p> <p>This product is very highly toxic to mammals and other wildlife. Birds and mammals feeding on carcasses of contaminated livestock may be killed. Keep out of any body of water. Apply this product only as specified on the label.</p> <p>ENDANGERED SPECIES CONSIDERATIONS</p> <p>Notice: It is a Federal offense to use any pesticide in a manner that results in the death of a member of an endangered species.</p> <p>The use of Compound 1080 in the Livestock Protection Collar has been determined to pose a hazard to several endangered species. See the technical bulletin (Use Restriction No. 15) for specific areas where the 1080 collar cannot be used or where approval must be obtained from the U.S. Fish and Wildlife Service prior to use.</p> <p>NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than that 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.</p> <p>UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE</p> <p>RIVERDALE, MD 20737 EPA Est. No. 46779-TX-01 EPA Reg. No. 56228-22 U.S. PAT. 3,842,806</p> <p>Net Contents: 30.4 grams (1.1 oz.) per collar</p> <p>Batch Code No.: _____</p>	<p>RESTRICTED USE PESTICIDE DUE TO ACUTE ORAL TOXICITY AND NEED FOR HIGHLY SPECIALIZED APPLICATOR TRAINING</p> <p>Collars shall be sold or transferred only by registrants or their agents and only to certified Livestock Protection Collar applicators. Collars may be used only by specifically certified Livestock Protection Collar applicators or by persons under their direct supervision.</p> <p>SODIUM FLUOROACETATE (COMPOUND 1080) LIVESTOCK PROTECTION COLLAR <i>For use on sheep or goats to kill depredating coyotes</i></p> <p>ACTIVE INGREDIENT Sodium Fluoroacetate 1.0% OTHER INGREDIENTS..... 99.0% TOTAL.....100.0%</p> <p>KEEP OUT OF REACH OF CHILDREN</p> <p>DANGER-PELIGRO POISON</p> 	<p>NOTE TO PHYSICIAN</p> <p>WARNING SYMPTOMS: 1080 poisoning results from the transformation of fluoroacetate into fluorocitrate within cell mitochondria. Poisoning is characterized by a symptom-free latent period of ½ to 2 hours or longer between ingestion and onset of symptoms (nausea, vomiting, diarrhea and hyperactive behavior leading to convulsions, coma and cyanosis). Ventricular fibrillation is commonly noted and is the primary cause of death. Early symptoms include alteration of heart sounds and premature, weak contractions.</p> <p>TREATMENT: No effective antidote is known. Symptomatic supportive treatment may be effective. Secure the airway and establish respirations. Gastric lavage may be indicated after recent ingestion; if this is performed in a patient with altered mental status, the airway should first be protected with endotracheal intubation. Administer activated charcoal, if possible. Treat seizures with IV benzodiazepines. Monitor cardiac function closely.</p> <p>CONSULT YOUR REGIONAL POISON CENTER (1-800-222-1222) FOR CURRENT TREATMENT GUIDANCE.</p> <p>DIRECTIONS FOR USE</p> <p>It is a violation of State and Federal Law to use this product in a manner inconsistent with its labeling or the Compound 1080 cancellation order. Misuse may result in civil or criminal enforcement action.</p> <p>DO NOT REMOVE TOXICANT FROM COLLARS. DO NOT USE TORN, DAMAGED OR LEAKING COLLARS. Dispose of damaged collars in accordance with the STORAGE AND DISPOSAL instructions on this label.</p> <p>Put collars on the necks of sheep or goats in fenced pastures where coyote predation is occurring or is expected to occur. Use collars only in accordance with the User Instructions and Use Restrictions contained in the accompanying Technical Bulletin.</p> <p>USE IN THE STATE OF OHIO</p> <p><u>In the state of Ohio this product must be used only by USDA APHIS Wildlife Services personnel in conjunction with the Predator Management Training Manual for Livestock Protection Manual as approved by the Ohio Department of Agriculture.</u></p>
<p>ACCEPTED 02/27/2017</p>	<p>EPA Reg. No. 56228-22 Revised 2/17/17 Page 1 of 2</p>	



STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store Livestock Protection Collars only in original container, in a dry, locked place away from food, feed, domestic animals and corrosive chemicals. Do not store in any structure occupied by humans.

When snow or frozen ground make on site disposal impractical, up to one cubic foot of wastes may be stored in a leakproof container, in a dry, locked place for up to 90 days.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of such materials is a violation of Federal Law.

Dispose of collars and other wastes contaminated by 1080 (carcasses, wool, hair, vegetation, soil, leather, clothing and water) under three feet of soil, at a safe location, preferably on property owned and managed by the applicator and at least one half mile from human habitations and water supplies.

Incineration may be used instead of burial for disposal in the field (*preferably on property owned or managed by the applicator*) at least $\frac{1}{2}$ mile from human habitation and water supplies. Place collars and wastes (listed above) in an incinerator or refuse hole, saturate with diesel fuel and ignite. Attend the burn until the contaminated material is completely consumed.

Alternatively, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance in disposing of wastes at approved hazardous waste disposal facilities.

CONTAINER DISPOSAL: Nonrefillable containers. Do not reuse or refill containers. Offer for recycling, if available.

Metal Containers: Triple rinse contaminated and uncontaminated containers with water promptly after emptying. If container is not to be recycled, puncture and dispose of contaminated containers and rinsate as above.

Plastic Containers: Triple rinse with water promptly after emptying. If container is not to be recycled, puncture and dispose of contaminated containers and rinsate as above.

COLLAR DISPOSAL: Dispose of punctured or unserviceable collars as above, except that not more than 10 collars may be buried in any one hole. If buried in trench, groups of 10 collars must be at least 10 feet apart.

SEE TECHNICAL BULLETIN FOR ADDITIONAL STORAGE AND DISPOSAL INSTRUCTIONS

1080 LIVESTOCK PROTECTION COLLAR
DANGER-POISON
EPA REG. NO 56228-22
USDA/APHIS RIVERDALE, MD
SERIAL NO

ACCEPTED

02/27/2017

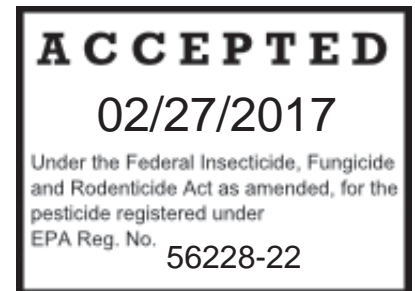
Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under

EPA Reg. No. 56228-22

Technical Bulletin
for the Sodium Fluoroacetate (Compound 1080)
Livestock Protection Collar
EPA Registration Number: 56228-22

By
Guy Connolly
Wildlife Research Biologist

Revised February 2017



U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Wildlife Services
4700 River Road
Riverdale, MD 20737-1237

DO'S AND DON'TS FOR LIVESTOCK PROTECTION COLLARS

DO:

- Read the label and Technical Bulletin before using collars
- Plan how to target coyotes to your collared animals before using collars
- Use appropriate size collars (small collars for 25- to 50-pound animals; large collars for larger animals)
- Be sure to position collars correctly (see Section I.D.2)
- Check and repair fences if necessary before putting collared animals in pasture
- Notify neighbors that collars can be hazardous to free ranging pets
- Keep warning signs in place as long as collars are being used (see Section II, Use Restriction 10 and Appendix B)
- Check collared animals weekly or more often to be sure that all are present and that collars are in position and not punctured (see Section I.D.3 and Section II, Use Restriction 11)
- Properly dispose of all collars, animals, vegetation, soil, water, leather clothing, and containers contaminated by 1080 (see Sections I.D.4 and I.D.5 and Section II, Use Restrictions 12 and 13)
- Report any suspected poisoning of nontarget animals or humans (see Section I.D.3.f and Section II, Use Restriction 6)
- Minimize human activity in pastures where collars are being used
- Keep records up to date as directed in the labeling (see Section II, Use Restrictions 4 and 5)
- Take collars off when predation has stopped or is not expected to occur
- Store collars properly when not in use (see Section II, Use Restriction 14)
- Wear water proof gloves when handling collars
- Wash your hands with soap and water after handling collars

DON'T:

- Waste time by placing collared animals where coyotes won't attack them
- Use collars if your livestock can be protected more easily or economically by other measures
- Use so few collared animals that coyotes won't find them
- Use more than 20 collars in any 100-acre or smaller pasture, or more than 50 collars per section (640 acres) of pasture (see Section II, Use Restriction 16)
- Use collars on unfenced, open range (see Section II, Use Restriction 8)
- Use collars where their use is prohibited to protect endangered wildlife (see Section II, Use Restriction 15)
- Use collars without required authorizations from the Fish and Wildlife Service Endangered Species Office (see Section II, Use Restriction 15)
- Use contaminated animals for food or feed (see Section II, Use Restriction 18)
- Use leaking or damaged collars
- Remove toxicant from collars

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SECTION I. USER INSTRUCTIONS

A. INTRODUCTION AND THEORY

The Livestock Protection Collar (LP Collar), invented by Roy McBride of Alpine, Texas, exploits the coyote's habit of killing sheep and goats by bites to the throat (Photo 1). As described in McBride's U.S. Patent Nos. 3,842,806 (issued in 1974) and 4,338,886 (issued in 1980), coyotes that attack collared livestock usually bite through the collars and receive oral doses of the contents. When used with a toxicant such as sodium fluoroacetate (Compound 1080), LP Collars kill the attacking coyotes. Collars may be used only by specifically certified LP Collar applicators of persons under their direct supervision (see Section II, Use Restriction 2). This Technical Bulletin is part of the EPA-approved labeling and contains detailed instructions for sale and effective use of LP Collars.

Coyotes' attacking and feeding behaviors do not seem to be affected by the presence of LP Collars. Attacking coyotes usually kill and feed upon collared animals just as they would if no collar were present. After a lethal dose of sodium fluoroacetate (Compound 1080) has been ingested, symptoms of intoxication typically do not appear for 2 or more hours. Death occurs from 2 to 7 hours (average 4 hours, 20 minutes) after the collar is punctured.

When LP Collars are used properly, coyotes may puncture them in 75 percent or more of their attacks. A 100 percent puncture rate is unlikely to be achieved because coyotes sometimes attack body sites other than the throat (Photo 2). Effective use of LP Collars requires not only that collars be positioned correctly, but also that coyote attacks be directed or targeted to collared livestock. Targeting may be difficult or impossible under some conditions. If coyotes are killing less than once per week, the collar technique may be impractical. Collars are recommended for ranches with high rates of coyote predation and management conditions that permit effective targeting of predations to collared livestock.

Experienced persons usually can evaluate local conditions quickly to decide whether or not LP Collars will be effective. In addition to the basic problem of targeting, other factors to consider in deciding whether or not to use collars include availability and effectiveness of other control methods; costs of collars; labor requirements to collar and monitor livestock; potential hazards of collars to humans, domestic animals, including pets, and non-target wildlife; and severity of predation.

B. TOXIC PROPERTIES OF SODIUM FLUOROACETATE (COMPOUND 1080)

Compound 1080 is highly toxic to warm-blooded animals, including man, when taken internally. Humans are not likely to be poisoned, except by ingestion of LP Collar contents. Based on available estimates of toxicity (0.7-2.1 mg/kg), one LP Collar contains approximately 2 to 6 lethal doses for a 150-pound man. Before using this product, read its current accepted container label (Appendix A) and the Use Restrictions in the Technical Bulletin (Section II) carefully. The EPA-accepted labeling for this product includes the container label, this technical bulletin, and the label that appears on the individual collars. This labeling is the appropriate source of legal product use requirements for applicators.

The toxic solution in LP Collars contains yellow dye (tartrazine) as a safety marker. Punctured, damaged, or broken collars, together with clothing, animal remains, vegetation, soil, or other materials marked by this dye, must be cleaned or disposed of in accordance with the label and Section I.D.5 and Section II, Use Restriction 13, of this Technical Bulletin. Collars with minor damage to straps or fastenings may be repaired by applicators as long as the toxicant reservoirs have not been punctured and do not leak.

Compound 1080 is hazardous to domestic animals, including livestock and pets. Dogs are particularly susceptible. In field studies, dogs have died after they attacked collared livestock and punctured the collars. As little as 0.1 ml of a LP Collar's contents may be fatal to a 25-pound dog. Dogs could be poisoned by scavenging the carcasses of collared livestock. Therefore, to minimize the potential hazard to dogs, promptly dispose of all livestock carcasses as well as coyote carcasses suspected of being poisoned by Compound 1080 according to instructions in this bulletin.

Pen studies have shown that an adult sheep can be fatally poisoned by eating forage containing as little as 1 ml of Compound 1080 solution from LP Collars. Although no livestock appeared to have been poisoned by eating contaminated vegetation during 5 years of field testing, it could happen. Therefore, contaminated forage must be disposed of as directed on the product labeling.

C. DESCRIPTION OF LP COLLARS

The LP Collar is a rubber bladder that contains a solution of Compound 1080 with neck straps for attachment to a sheep or goat. The type of collar used most to date has two Velcro neck straps (0.75 inches wide and 22-25 inches long on new collars). Three-strap models also are available and are intended for use on goats. Each collar has two toxicant reservoirs that contain 150 mg (0.15 grams) of sodium fluoroacetate (active ingredient). Each collar contains a total of 300 mg (0.3 grams) of sodium fluoroacetate (active ingredient).

LP Collars of two sizes are available (Photo 3). The small collar is intended for lambs and kids weighing from 25 to 50 pounds; the larger for sheep and goats weighing more than 50 pounds. LP Collars are not recommended for small animals (under 25 pounds). A small collar, properly in place on a lamb, is shown in Photo 4. Photo 5 shows a large collar properly positioned on an adult Angora goat.

D. MANAGEMENT OF LP COLLARS ON SHEEP AND GOATS

1. Things to do before putting LP Collars on livestock
 - a. Be sure you have enough LP Collars (see Section E).
 - b. Inspect all LP Collars for leaks and inspect straps to be sure they are securely attached. Do not use leaking or torn collars (Photo 7) or collars on which the straps are coming loose (Photo 8). Loose straps may be reattached by sewing.
 - c. Check the fence around the pasture where collared animals are to be placed and repair as necessary to keep animals within the pasture.

- d. Establish locations for warning signs (Appendix B), and be sure you have enough signs (see use Section II, Use Restriction 10).
- e. Inform neighbors of your intent to use LP Collars and advise them of the potential hazards to free-roaming dogs.
- f. If ear tags or other marks are to be used, have the tags and related equipment on hand.
- g. Consult the EPA-accepted container label for this product (Appendix A) for first aid information for what to do in case of exposure to Compound 1080 and emergency contact information. Have water on hand to flush any exposed areas of the body. Have a few good quality plastic bags or other leak proof containers on hand for packaging damaged collars.
- h. Select and pen the target flock (animals to be collared).

2. Attaching LP Collars

- a. Hold LP Collars up to the necks of target livestock to determine the size of collar needed for each animal (Photo 9). The rubber portion of the collar should come up to the ear (Photo 4). If the collar is too small, there will be an unprotected region below each ear (Photo 10). This will result in a lower puncture rate than would be obtained with collars of proper size.
- b. One person can put LP Collars on livestock, but the task is much easier for a two-person team. One person holds each animal while the other attaches its collar. To attach a collar, hold it in position under the animal's throat. Tighten the rear strap over the animal's neck just behind the ears and fasten it temporarily. Then tighten the front strap over the head between the eyes and ears and fasten it securely. Straps should be positioned to keep the rubber part of the collar directly below the ear (Photo 4, Photo 5, and Photo 6). On goats with horns the front strap may pass in front of both horns or in front of one horn and behind the other. If necessary, use string or twine to tie the front strap to one or both horns to keep the collar in position, readjust the rear strap if necessary, and then secure it. If the straps are longer than needed, a knife or scissors can be used to trim off the excess. Fasten the strap ends by stapling (Photo 12).
- c. LP Collar straps must be tight enough to prevent collars from slipping out of position (Photo 13), but not so tight as to choke the animal or cause sores (Photo 14). Each strap should be loose enough that the applicator can insert 2 fingers between the strap and the animal. Collars stay in place well on animals with wool or mohair, but may be difficult to keep in position on newly shorn or slick-necked animals, particularly goats (Photo 11). Head and neck conformation varies among animals and it may be impossible to keep collars in place on some individuals. These individuals should be taken out of the collared flock.
- d. A suitable method of permanently identifying individual animals in a target flock is required to keep track of LP collared livestock. One such method is the use of

numbered ear tags. Tags that can be read from a distance of 50 feet or more are most useful (Photo 15). If you are using ear tags, attach them before the animal is collared.

- e. When the LP Collar is in place, release the animal into a corral or other confined area and observe it carefully. Listen for labored breathing that may indicate the collar is too tight. When first released, collared sheep and goats often shake their heads, rub or make other attempts to rid themselves of the collars. This behavior will stop within a few hours, if collars are not too tight. After you are satisfied that the collars are properly attached, move collared animals to the desired location.
- f. Place warning signs at logical points of access (see Section II, Use Restriction 10 and Appendix B).

After handling LP Collars, wash your hands with soap and water.

3. Monitoring LP collared livestock

- a. Once LP collared animals are in the desired location, the pasture should be checked every 7 days or more often if frequent predation is expected. During each check try to locate each animal and observe collars to be sure they are in position. If the collar has slipped out of position, catch the animal and reposition its collar. Inspect each animal's neck for yellow dye which could indicate a punctured or leaking collar. If dye is seen, catch the animal and check the collar. Replace any damaged or leaking collar. See the label and Section I.D.5 and Section II, Use Restriction 13, of this Technical Bulletin. Collars on small kids or lambs may require periodic adjustment to allow for growth.
- b. When searching for LP collared livestock, watch for both animal carcasses and congregations of scavenging birds that could indicate the locations of carcasses. Whenever you visit a pasture, record the identity of each collared animal seen. Check each warning sign weekly to ensure that it is in place and is legible.

Based on experience gained in research studies, you will not see each LP collared animal every time you visit large, brushy pastures. Any animal not accounted for in two consecutive checks may be dead. An intensive search for it must be made. In addition, if more than three collared animals are not accounted for during any one check, an intensive search for these animals is required. Pastures must be systematically searched in their entirety or until the missing animals are located.

- c. If more than nine (9) LP Collars and/or collared animals are unaccounted for during any 60-day period, remove all collars from animals and terminate their use. Seek technical advice if necessary to determine and correct the cause(s) of collar loss. Collar use may be resumed after adequate steps have been taken to prevent further, excessive loss of collars. See Section II, Use Restriction 11.
- d. Routine checks of LP collared livestock are difficult if the animals are secretive or wild. Feed concentrates can be used to train animals to come to you or your vehicle. This facilitates the identification and inspection of collared livestock (Photo 16). It

also helps to have a few tame animals in the collared flock. Binoculars may be useful for inspecting collared livestock from a distance.

- e. Infrequently, LP Collars may be missing from carcasses of sheep or goats, killed by coyotes. In research studies, missing collars appeared to have been carried or dragged away by coyotes. Some were found as far as half a mile away from kill sites, but about half of the missing collars were never recovered. Coyotes sometimes cache (hide or bury) them. Whenever a collar is missing, make a reasonable effort to find it. See Section II, Use Restriction 11.
 - f. If you see an animal that you think may have been poisoned, report it promptly to the appropriate regulatory agency. Any suspected poisoning of threatened or endangered species must be reported immediately. See Section II, Use Restriction 6.
4. Handling LP Collars and contaminated animal remains, vegetation, clothing, water and soil.
- a. The toxic solution in the LP Collar contains a yellow dye, tartrazine, which is used as a marker for the presence of Compound 1080 on punctured, damaged or broken collars; on clothing, animal remains, vegetation, soil, or other materials; and in water. Always use waterproof gloves when handling collars or any materials known to be contaminated by Compound 1080.
 - b. Inspect carcasses of LP collared animals to determine the cause of death. When the carcasses are fresh (within 24 hours after death), coyote kills usually are obvious (Photo 17). Remove punctured collars carefully and examine the punctures. Holes made by coyote teeth usually can be distinguished from accidental punctures. When collars are punctured by cactus thorns, the thorns sometimes remain in the holes (Photo 18).
 - c. If the LP Collar was punctured, remove it carefully to minimize leakage and place in a leak proof plastic bag or other container for transport to your disposal site. If necessary, double bag to prevent leakage. Examine the carcass for contamination as indicated by yellow dye. Cut away the contaminated parts for disposal along with punctured collar. See Section II, Use Restrictions 12 and 13. Dispose of the remainder of the carcass using your normal practice. Cut or dig up contaminated forage and soil and place them in a leak proof container for transport to the disposal site.
 - d. If the LP Collar was not punctured, save it for reuse on another animal. Dispose of carcass using your normal practice. No special handling is required. If an unpunctured collar has only minor damage to straps or fasteners, the applicator may repair it.
 - e. When predation has stopped, or when LP Collars are to be taken off for other reasons, such as shearing, gather the collared flock into a corral. Hold each animal and inspect its collar for punctures. Loosen the neck straps and pull them free. Do not pull so hard that you rupture the collar (Photo 7). It may be necessary, particularly with

Angora goats, to use a knife or scissors to free collar straps from the animal's hair. Clean unpunctured collars as necessary and return them to locked storage until you need them again.

- f. If clothing becomes contaminated with Compound 1080 solution, remove it promptly. Wash clothes before wearing them again. Contaminated leather clothing, including gloves and footwear, should be disposed of in the same manner as contaminated animal remains because pesticides cannot be easily cleaned from leather. See Section II, Use Restriction 13.

5. Disposal of damaged LP Collars and other contaminated materials

- a. Damaged, punctured or leaking LP Collars, contaminated animal remains, vegetation, soil, water and leather clothing must be properly disposed of. The preferred method is by deep burial under 3 feet of soil in a safe field location at least one-half mile from human habitations and water supplies. For disposal on the ranch, it may be convenient to drill several deep holes using a mechanized post hole auger, or to make a trench with a backhoe. Then, as waste materials are produced, they can be dropped into the hole or trench and covered with earth. Not more than 10 collars may be buried in any one hole. If buried in a trench, each group of ten collars must be at least 10 feet apart.
- b. Incineration may be used instead of burial for disposal in the field (preferably on property owned or managed by the applicator) at least ½ mile from human habitation and water supplies. Place collars and wastes (listed above) in an incinerator or refuse hole, saturate with diesel fuel, and ignite. Attend the burn until the contaminated material is completely consumed.
- c. Alternatively, contact your State Pesticide or Environmental Control Agency or the Hazard Waste representative at the nearest EPA Regional Office for guidance in disposing of wastes at approved hazardous waste disposal facilities.
- d. When snow or frozen ground make on site disposal impractical, up to one cubic foot of wastes may be stored in a leak proof container, in a dry, locked place for up to 90 days.

E. DIRECTING COYOTE PREDATION TO LP COLLARED LIVESTOCK

1. General comments

The process of directing coyote predation to LP collared livestock is called targeting. Knowledge of targeting is in its infancy and should improve as more people gain experience with LP Collars. Three different approaches or targeting strategies are described here. Ranchers and predation control specialists are encouraged to apply these methods as necessary to achieve the best results in their own circumstances.

2. Targeting strategies

- a. Place LP Collars on vulnerable livestock. Collaring all sheep or goats on a ranch would solve the targeting problem. This strategy has not been tested due to the cost of collars and the large number that would be required in large flocks (over 100 animals). Nevertheless, in small flocks (50 or fewer animals) it may be practical to collar all the lambs or kids. In flocks with 50 to 100 lambs or kids, it may be worthwhile to collar the smallest 20 to 50 individuals. Do not use more than 20 collars in any pasture under 100 acres, or more than 50 collars per square mile of fenced pasture.
- b. Use target (LP collared) flocks. When coyotes are killing in particular pastures, remove all vulnerable livestock. Place 20 to 50 collared lambs or kids with their mothers in the pasture while all other vulnerable animals are penned at night or moved elsewhere. Add uncollared adult sheep or goats to the target flock to increase its total size to 50 or 100 head. If coyotes have been killing adult sheep or goats in the area, both adults and kids in the target flock should be collared. Remove collars 30 days after predation ceases, or whenever the risk of predation has abated.

This was the strategy used in most field tests and is the usual approach when LP collars are introduced onto a ranch where predation is in progress. This strategy also can be employed by placing collared flocks in vacant pastures 1 to 2 months before large bands of sheep or goats arrive.

- c. Collar vulnerable individuals in large flocks. Coyotes usually prefer kids or lambs to adult goats or sheep. Experience with Angora goats has shown that if a few collared kids are placed in wether¹ flocks (5-10 collared kids per 100 uncollared adults), coyotes will select the kids (Photo 20). As this strategy has not been tested on sheep, it is not recommended for sheep at this time.

3. Mistakes in targeting

As with any new technique, one must learn how to use LP Collars before optimum results can be expected. Following is a list of some mistakes commonly made by persons learning this technique:

- a. Placing collars where effective targeting cannot be expected. In one example, 20 lambs were collared in a ewe-lamb flock containing hundreds of lambs. Coyotes subsequently killed the uncollared lambs. Effective targeting did not occur because collared lambs were far outnumbered by uncollared lambs that were equally attractive to coyotes.
- b. Placing collars where predation is too infrequent. In one such case, collared sheep were exposed for four weeks during which no predation occurred. The users then lost

¹ Wethers are castrated male goats.

interest and removed the collars. There was no further predation on this ranch for several months. Collars cannot be used effectively where there is little or no predation.

- c. Using target flocks that are too small. In a Montana trial, six LP-collared lambs were placed in a 640-acre pasture. Coyotes passed through the pasture without finding the collared animals and then killed sheep from a large flock in an adjacent pasture. The larger the flock, the more likely it is to attract coyotes. The optimum size for target flocks has not been determined, but pastures of 100 acres or more should probably contain at least 50 head.
- d. Using target flocks that are not sufficiently isolated from uncollared livestock. On one small farm, a group of ewes and LP-collared lambs was exposed while other sheep on the place were penned each night. Instead of killing in the collared flock, coyotes switched to a neighbor's unprotected flock half a mile away. With small farm flocks, adjacent land owners may have to work together to achieve effective targeting.
- e. Using collars of the wrong size. When small LP Collars are used on large sheep or goats, the throat region is inadequately covered (Photo 10). Coyotes frequently kill these animals without puncturing the LP Collars.
- f. Attaching collars improperly or not securely. When LP Collars are attached improperly, or they slip out of position (Photo 13), coyotes will kill these animals but are unlikely to puncture the collars. LP Collars in proper position are shown in Photo 4, Photo 5, Photo 6, Photo 11, and Photo 16.
- g. Placing collars on sick or cull animals. Placing collars on sick or cull animals in effort to avoid sacrificing more valuable livestock may be false economy, as coyotes may not attack ill or lethargic animals. Collars should be used only on animals of the size and kind that coyotes have been killing locally.
- h. Greatly increasing level of human activity on ranch while collars are in use. Coyotes often are wary of unusual activity and may temporarily stop killing because of it. Collars should be placed and monitored with a minimum of disruptive activity.

SECTION II. USE RESTRICTIONS

Use Restriction 1

Use of LP Collars shall conform to all applicable Federal, State and local regulations.

Use Restriction 2

LP Collars shall be sold or transferred only by registrants or their agents and only to certified Livestock Protection Collar applicators. Collars may be used only by specifically certified Livestock Protection Collar applicators or by persons under their direct supervision.²

The certified applicator is directly responsible for assuring that all use restrictions are met. The certified applicator will decide, in accordance with label directions, when and under what circumstances LP Collars will be used. The certified applicator will either apply collars or be physically present where collars are applied by a noncertified person. However, a noncertified person who has received adequate instructions from the certified applicators may store collars, check collars in the field, remove collars, repair or dispose of damaged collars in accordance with use restrictions, retrieve collars lying in the field, and properly dispose of contaminated material and animal carcasses.

Use Restriction 3

Certification of applicators shall be performed by appropriate regulatory agencies. Prior to certification, each applicator shall receive training which will include, but need not be limited to:

- a. Training in safe handling and attachment of LP Collars.
- b. Training in disposal of punctured or leaking LP Collars, and contaminated animal remains, vegetation, soil, and clothing.
- c. Instructions for practical treatment of Compound 1080 in human and domestic animals.
- d. Instructions on record keeping.

Use Restriction 4

Registrants or their agents shall keep records of all collars sold or transferred at their address of record. Records shall include the name, address, state where LP Collar certification was issued, certification number of each recipient, and dates and numbers of collars sold or transferred.

Use Restriction 5

Each applicator shall keep records dealing with the use of LP Collars and the results of such use. Records shall be maintained in accordance with appropriate State or Federal

² "Direct Supervision", as described in this restriction, conforms to the requirements established under 40 CFR 171.6.

regulations but for not less than two years following disposal or loss of collars. Such records shall include, but need not be limited to:

- a. The number of LP Collars attached on livestock.
- b. The pasture(s) where LP collared livestock were placed.
- c. The dates of each attachment, inspection, and removal.
- d. The number and locations of livestock found with ruptured or punctured LP Collars and the apparent cause of the damage.
- e. The number, dates, and approximate location of LP Collars lost.
- f. The species, locations, and dates of all suspected poisonings of humans, domestic animals, or non-target wild animals resulting from LP Collar use.

Use Restriction 6

Any suspected poisoning of threatened or endangered species must be reported immediately, within three days, to the Environmental Protection Agency, as will each suspected poisoning of humans, domestic animals or non-target wild animals. The person to contact at the Environmental Protection Agency is Branch Chief, Invertebrate and Vertebrate Branch 3, Registration Division, Office of Pesticide Programs, U.S. Environmental Protection Agency, 1250 Pennsylvania Avenue, NW, Washington, DC 20460.

Use Restriction 7

Only the registrant or collar manufacturer is authorized to fill LP Collars with Compound 1080 solution. Certified applicators are not authorized to fill LP Collars. Compound 1080 solution may not be removed from collars and used for any other purpose.

Use Restriction 8

LP Collars shall only be used to take coyotes within fenced pastures³ no larger than 2,560 (4 square miles). But where average annual precipitation does not exceed 20 inches and vegetation is sparse, consisting only of short to mid-height grasses and scattered shrubs, collars may be used in pastures up to a maximum of 10,000 acres (16 square miles) in size.

³ Fenced pastures include all grazing land that is enclosed by livestock fencing. This includes wire or other man-made fences such as rock walls, and natural barriers such as escarpments, lakes, and large rivers that will prevent escape of livestock.

In no case shall the applicator place LP collared livestock in pastures where compliance with other Use Restrictions, such as monitoring, is impossible; in fenced pastures larger than 10,000 acres; or in unfenced, open range.

Use Restriction 9

LP Collars shall be used only where losses of sheep or goats due to predation by coyotes are occurring or, based upon prior experience, where coyote predation can reasonably be expected to occur.

Use Restriction 10

Where LP Collars are in use, each logical point of access (for example, roads, gates, and trails), shall be conspicuously posted with a bilingual (English/Spanish or other second language appropriate for the region) warning sign not less than 8"x10" in size. Signs shall be inspected weekly to ensure their continued presence and legibility and will be removed when collars are removed. The signs will have a minimum type size for "DANGER-POISON" of 24 point (1/4 inches), with remaining text at least 18 point (3/16 inches).

Use Restriction 11

All LP collared livestock must be checked at least once every seven days and collars adjusted if needed.

If any LP collared animal is not accounted for in two consecutive checks, an intensive search for it must be made.

In addition, if more than three LP collared animals are not accounted for during any one check, an intensive search for these animals is required.

If more than nine (9) LP Collars are unaccounted for during any 60-day period, remove all collars from animals and terminate their use. Do not resume until adequate steps have been taken to prevent further, excessive loss of collars.

Use Restriction 12

Damaged, punctured, or leaking LP Collars shall be removed from the field for repair or proper disposal. Damaged collars shall be placed individually in leak proof containers while awaiting repair or proper disposal. Authorized collar repairs are limited to minor repairs of straps and fastenings. Leaking or punctured collars must be properly disposed.

Use Restriction 13

Dispose of Compound 1080 wastes (punctured, leaking, or otherwise unrepairable LP collars; contaminated leather clothing, animal remains, wool, hair, vegetation, water, and soil) under three feet of soil, at a safe location, preferably on property owned or managed by the applicator and at least ½ mile from human habitations and water supplies. No

more than 10 collars may be buried in any one hole. If buried in a trench, each group of 10 collars must be at least 10 feet apart.

Incineration may be used instead of burial for disposal in the field (preferably on property owned or managed by the applicator) at least ½ mile from human habitation and water supplies. Place collars and wastes (listed above) in an incinerator or refuse hole, saturate with diesel fuel, and ignite. Attend the burn until the contaminated material is completely consumed.

Alternatively, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest U.S. EPA Regional Office for guidance in disposing of wastes at approved hazardous waste disposal facilities.

When snow or frozen ground make on-site disposal impractical, up to one cubic foot of wastes may be stored in a leak-proof container, in a dry, locked place for 90 days.

Compound 1080 containers are nonrefillable. Do not reuse or refill containers. Offer for recycling, if available.

Metal containers: Triple rinse contaminated and uncontaminated container with water promptly after emptying. If container is not to be recycled, puncture and dispose of contaminated containers and rinsate, as above.

Plastic containers: Triple rinse with water promptly after emptying. If the container is not to be recycled, puncture and dispose of container and rinsate, as above.

Use Restriction 14

All persons authorized to possess and use LP Collars shall store them under lock and key in a dry place away from food, feed, domestic animals, and corrosive chemicals, and in outbuildings, or in outdoor storage areas attached to but separate from human living quarters.

Use Restriction 15

Provisions for protection of endangered species:

The LP Collar may not be used within three miles of occupied habitat of the jaguarundi and ocelot in the following areas:

State	Counties
Texas	Cameron, Hidalgo, Kleberg, Jim Wells, Kenedy, Starr, Willacy and Zapata

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The LP Collar may not be used within the geographical range of the Louisiana black bear near the Mississippi River in Mississippi and in the Atchafalaya and Tensas River basins in Louisiana.

The LP Collar may not be used in the following areas due to potential adverse effects to endangered species (California condor).

State	Counties
California	Fresno, Kern, Kings, Los Angeles, Monterey, San Benito, San Luis Obispo, Santa Barbara, Tulare and Ventura

The LP Collar may not be used in the following areas without written approval from the nearest U.S. Fish and Wildlife Service Office (FWS, Endangered Species Specialists). If FWS or the user determines that use of collars may adversely impact an endangered species (San Joaquin kit fox, black-footed ferret, Northern Rocky Mountain wolf, or grizzly bear) in the specific areas requested, collars may not be used in these areas. Written approval must be obtained annually.

State	Counties or Area	Nearest FWS Office
California	Alameda, Contra Costa, Merced, San Joaquin, Santa Barbara, Santa Clara, & Stanislaus, and Tulare	Sacramento 916-414-6464
Idaho	Bonner, Boise (north of State Hwy 21) Boundary, Clearwater, Custer (north of Local road running from Sun Valley to Chilly to Patterson), Fremont, Lemhi, Shoshone and Valley	Boise 208-378-5243
Michigan	Keweenaw (Isle Royal) and entire Upper Peninsula	Twin Cities, Minnesota 612-725-3548
Minnesota	Aitkin, Becker, Beltrami, Carlton, Cass, Clearwater, Cook, Crow Wing, Hubbard, Itasca, Kittson, Koochiching, Lake, Lake Of the Woods, Mahnomen, Marshall, Pennington, Pine, Roseau, and St. Louis	Twin Cities, Minnesota 612-725-3548

State	Counties or Area	Nearest FWS Office
Montana	Beaverhead, Carbon, Flathead, Gallatin, Glacier, Lake, Lewis and Clark, Lincoln, Madison, Missoula, Park, Pondera, Powell, Sanders, Stillwater, Sweet Grass & Teton	Helena 406-449-5225
Washington	Pend Oreille, Okanogan (National Park And Forest Land), Skagit and Whatcom	Boise, Idaho 208-378-5243
Wisconsin	Douglas, Florence, Lincoln, Oneida and Price	Twin Cities, Minnesota 612-725-3548
Wyoming	Fremont, Park, and Teton and Yellowstone National Parks	Helena, MT 406-449-5225

Use Restriction 16

The number of LP Collars used shall be the minimum necessary for effective livestock protection. For pastures of the following size classes, do not use more collars than the number indicated.

Size (acres)	Number of Collars
Up to 100	20
101 to 640	50
641 – 10,000*	100

*See Section II. 8.

Use Restriction 17

Consult the EPA-accepted container label for this product (Appendix A) for first aid information for what to do in case of exposure to Compound 1080 and emergency contact information.

Use Restriction 18

No contaminated animal will be used for food or feed.

SECTION III. PHOTOGRAPHS



Photo 1. When coyotes attack sheep or goats, they usually bite at the throat. The LP Collar is an effective way to deliver chemicals selectively to depredating coyotes.



Photo 2. A coyote attacked this Angora goat at the rear, but did not puncture the LP Collar. The goat had to be destroyed because of its injuries.

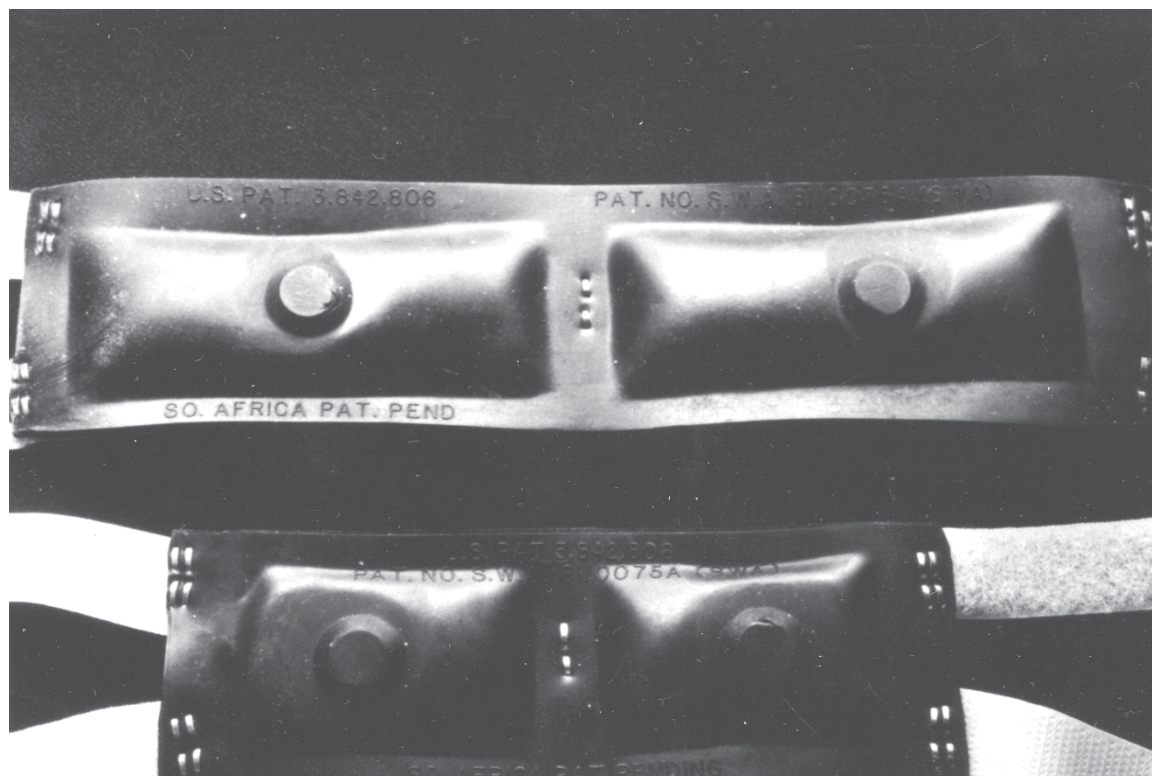


Photo 3. Large and small LP Collars made by Ranchers Supply, Alpine, Texas. Each toxicant reservoir is 1.5 inches wide and 3.75 inches long on large collars (top) or 2.25 inches long on small collars (bottom). The beige Velcro straps are 0.75 inches wide and 22-25 inches long.



Photo 4. LP Collar on a 30-pound lamb. Note that the toxicant reservoir comes up almost to the ear.



Photo 5. Large LP Collar on an adult Angora goat.



Photo 6. Elastic-strap LP Collar on a 50-pound lamb. In field tests on Angora goats the rate of collar puncture by attacking coyotes was lower for elastic-strap than for Velcro-strap collars.

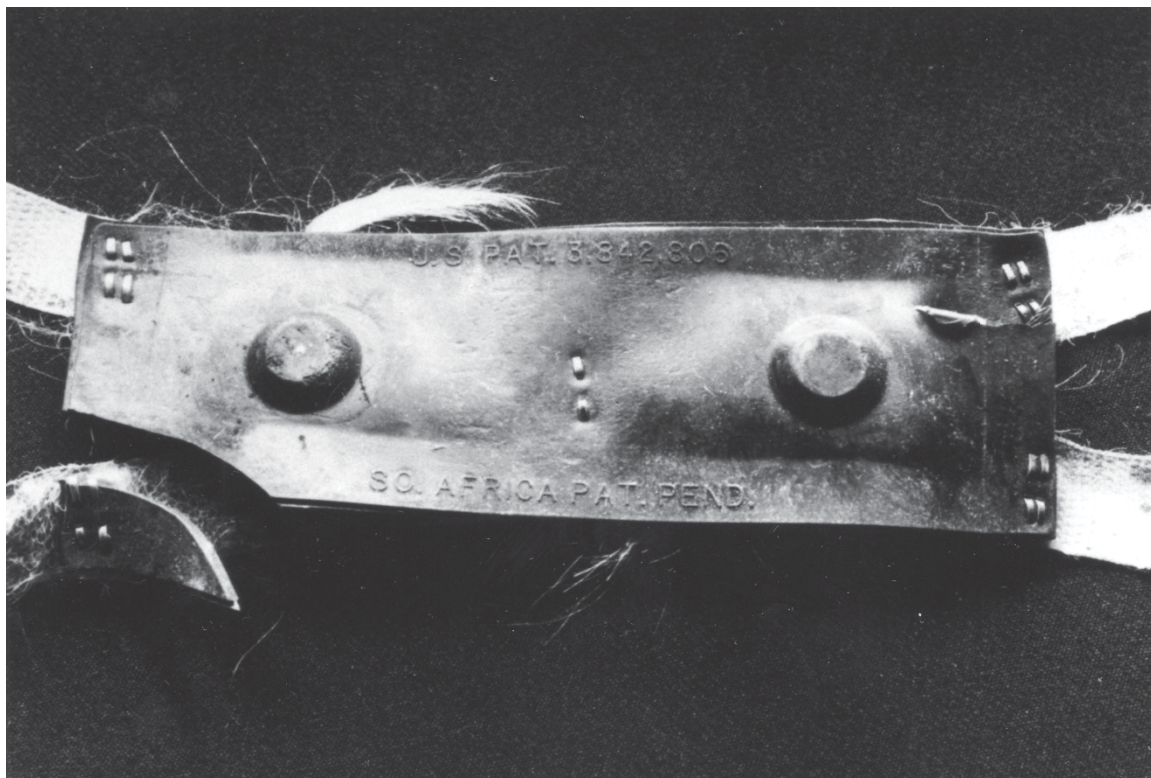


Photo 7. The corners of this LP Collar tore when the collar was being removed from an Angora goat. To avoid such damage, a knife or scissors can be used to free collar straps from hair or wool.



Photo 8. The rubber portion of this LP Collar was poorly attached to the neck straps. Repairs can be made by sewing or stapling neck straps back in position. Only heavy thread or staples should be used.



Photo 9. This small LP Collar is too small for effective coverage on this 100-pound lamb.



Photo 10. This lamb's LP Collar is too small. Note the unprotected region below the ear. Large collars are better used on lambs of this size.



Photo 11. To keep the LP Collar in position on this Angora goat, the forward collar strap was tied to a horn using butcher's twine. Any heavy string or cord will do.



Photo 12. An ordinary office stapler can be used to tack LP Collar strap ends in place. These staples are inadequate for reattaching straps to collars (see Photo 8).



Photo 13. The LP Collar on this Angora goat has slipped back out of position. If the LP Collar was in this position when a coyote attacked, the collar probably would not be punctured.



Photo 14. If LP Collar straps are too tight, they will cause abrasions that become infected and attract flies, as shown on this Angora goat. This problem is more common with goats than sheep. It can be avoided by checking strap tension frequently.



Photo 15. Numbered ear tags are a valuable aid in keeping track of collared livestock. The numbers on this tag can be read at a distance of 50 feet or more.



Photo 16. Checking of LP collared livestock is easy if the animals are trained to come for feed.



Photo 17. Typical remains of a LP collared lamb that was killed and fed upon by coyotes. The collar was punctured.

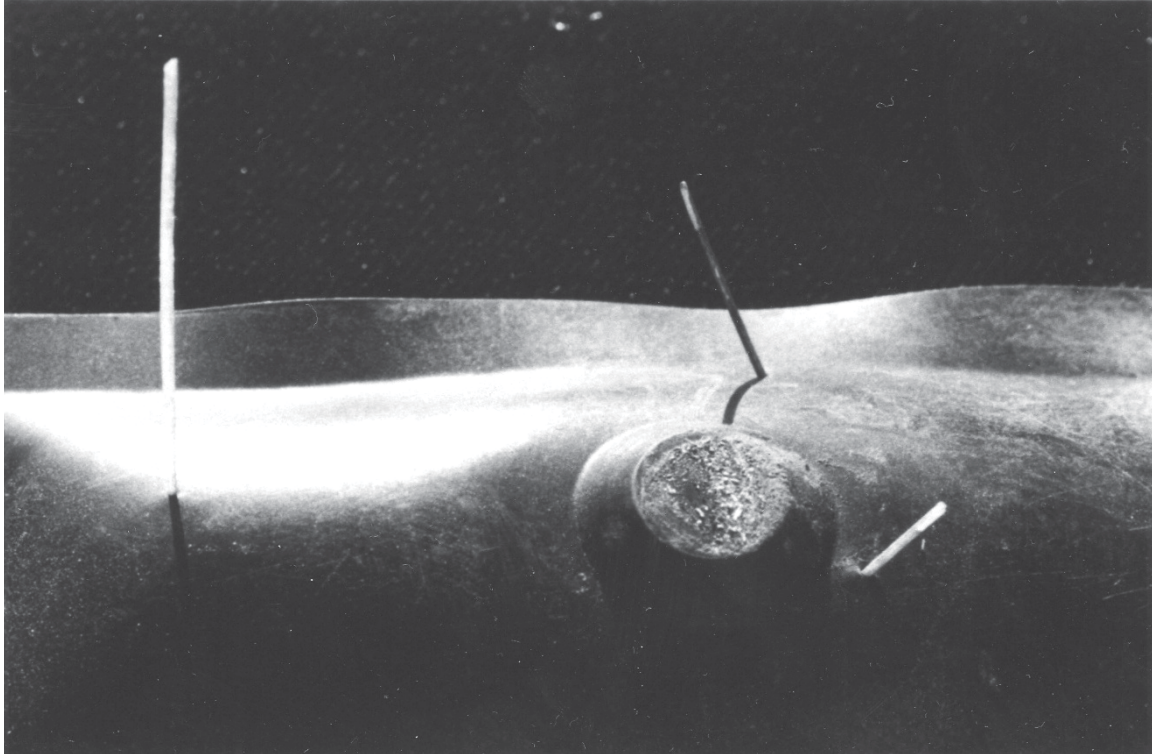


Photo 18. An LP Collar punctured by prickly pear thorns. Thorn punctures are smaller than coyote tooth punctures. This damaged collar cannot be reused.



Photo 19. This coyote was found dead 0.4 miles from the spot where it attacked a LP collared lamb and punctured the collar. Laboratory analyses confirmed that it was killed by the collar toxicant, Compound 1080.



Photo 20. Adult Angora goat flocks can be protected with LP Collars by adding 5 to 10 collared kids per 100 uncollared adults. Two collared kids appear in this photograph (facing camera, left of center). Tests showed high coyote selection for the kids.

APPENDIX A. REGISTERED CONTAINER LABEL

[illegible]

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store Livestock Protection Collars only in original container, in a dry, locked place away from food, feed, domestic animals and corrosive chemicals. Do not store in any structure occupied by humans.

When snow or frozen ground make on site disposal impractical, up to one cubic foot of wastes may be stored in a leakproof container, in a dry, locked place for up to 90 days.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of such materials is a violation of Federal Law.

Dispose of collars and other wastes contaminated by 1080 (carcasses, wool, hair, vegetation, soil, leather, clothing and water) under three feet of soil, at a safe location, preferably on property owned and managed by the applicator and at least one half mile from human habitations and water supplies.

Incineration may be used instead of burial for disposal in the field (*preferably on property owned or managed by the applicator*) at least ½ mile from human habitation and water supplies. Place collars and wastes (listed above) in an incinerator or refuse hole, saturate with diesel fuel and ignite. Attend the burn until the contaminated material is completely consumed.

Alternatively, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance in disposing of wastes at approved hazardous waste disposal facilities.

CONTAINER DISPOSAL: Nonrefillable containers. Do not reuse or refill containers. Offer for recycling, if available.

Metal Containers: Triple rinse contaminated and uncontaminated containers with water promptly after emptying. If container is not to be recycled, puncture and dispose of contaminated containers and rinsate as above.

Plastic Containers: Triple rinse with water promptly after emptying. If container is not to be recycled, puncture and dispose of contaminated containers and rinsate as above.

COLLAR DISPOSAL: Dispose of punctured or unserviceable collars as above, except that not more than 10 collars may be buried in any one hole. If buried in trench, groups of 10 collars must be at least 10 feet apart.

SEE TECHNICAL BULLETIN FOR ADDITIONAL STORAGE AND DISPOSAL INSTRUCTIONS

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APPENDIX B. BILINGUAL WARNING SIGN



DANGER – POISON



TO CONTROL STOCK-KILLING PREDATORS
SHEEP OR GOATS IN THIS AREA ARE WEARING
NECK COLLARS THAT CONTAIN A POISON,
COMPOUND 1080 (Sodium Fluoroacetate)
**DO NOT TOUCH COLLARED LIVESTOCK,
COLLARS, OR DEAD ANIMALS,
DO NOT RELEASE LIVESTOCK**



PELIGRO – VENENO



PARA CONTROLAR ANIMALES PREDATORIOS QUE
ATACAN AL GANADO
ALGUAS OVEJAS O COBRAS EN ESTA ÁREA LLEVAN
COLLARES QUE CONTIENEN UN VENENO
COMPUESTO 1080 (Fluoroacetato de sodio)
**NO TOQUE LOS ANIMALES, LOS COLLARES, NI
LOS ANIMALES MUERTOS
NO SUELTE A LAS OVEJAS O CABRAS**