

Column E Explanation

1. Registration Number: 84-R-0051

2. Number: 46

3. Species (common name): Plains Pocket Gophers

4. Explain the procedure pain and/or distress:

Rodenticides were applied as baits in underground gopher tunnels in the field as a multi-day oral treatment. Animals may experience pain and discomfort as a result of consuming toxic bait.

5. Provide scientific justification why pain and/or distress could not be relieved. State methods or means used to determine that pain and/or distress relief would interfere with test results. (For Federally mandated testing, see item 6 below):

Purpose of study was to assess the efficacy of the product under the actual use of condition per EPA Guideline referenced in item 6.

The use of anesthetics, analgesics, or tranquilizing drug or procedure to relieve the pain would interfere with the results. There are no alternative available to this painful procedure.

6. What, if any, federal regulations require this procedure? Cite the agency, the code of Federal Regulations (CFR) title number and the specific section number (e.g. APHIS, 9 CFR 113.102):

The US EPA, Office of Pesticide Programs, Guideline Subdivision G: 96-12, Rodenticides on farm and rangelands, section e- Field Efficacy Studies

Column E Explanation

1. Registration Number: 84-R-0051

2. Number: 19

3. Species (common name): Wyoming Ground Squirrels

4. Explain the procedure pain and/or distress:

Rodenticides were applied as baits in the ground squirrel active burrows in the field as a multi-day oral treatment. Animals may experience pain and discomfort as a result of consuming toxic bait.

5. Provide scientific justification why pain and/or distress could not be relieved. State methods or means used to determine that pain and/or distress relief would interfere with test results. (For Federally mandated testing, see item 6 below):

Purpose of study was to assess the efficacy of the product under the actual use of condition per EPA Guideline referenced in item 6. An acceptable level of efficacy should result in at least a 70% reduction of rodent activity.

The use of anesthetics, analgesics, or tranquilizing drug or procedure to relieve the pain would interfere with the results. There are no alternative available to this painful procedure.

6. What, if any, federal regulations require this procedure? Cite the agency, the code of Federal Regulations (CFR) title number and the specific section number (e.g. APHIS, 9 CFR 113.102):

The US EPA, Office of Pesticide Programs, Guideline Subdivision G: 96-12, Rodenticides on farm and rangelands, section e- Field Efficacy Studies