



February 11, 1991

418154-00

Mr. Frank T. Sanders
Chief, Fungicide-Herbicide Branch
Registration Division
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED

Dear Mr. Sanders:

R.C.G., Inc. has developed a new use for cinnamon. As you know the product is a centuries old spice, obtained from the bark of trees. The Cinnamon will be a new active ingredient under the definitions of P.R. NOTICE 86-4. R.C.G. wishes to have the active ingredient in their new product declared a biochemical. We, therefore, wish to place before the EPA Biotechnology Group, headed by Dr. Reto Engler, the active ingredient C. cassia. This active is commonly known as Cinnamon.

The criteria listed in the Title 40, 158.65 which must be satisfied in order to be classified as a biochemical are:

- 1) A unique nontoxic mode of action.
- 2) A low use volume.
- 3) Specificity to the target.
- 4) Natural occurring.

We certainly satisfy these criteria. Our Cinnamon is obtained from and packaged

We have determined that CINNAMON acts to repel cockroaches very effectively. Therefore, it is our desire to register our product for use as a REPELLANT.

Our submission, then, is twofold in intent. First, we wish EPA's concurrence that our active ingredient is a biochemical under the requirements of 40C.F.R., 158.65 and 158.690. Secondly, based upon this expected concurrence we wish to request waivers from the data requirements for biochemicals (158.590). Since our active ingredient is nothing more than the bark of a tree, has been ingested by humans for centuries and is GRAS according to FDA criteria we maintain that performance of some of the data requirements would be meaningless.

Included with this submission are the following:

- A) An EPA letter acknowledging that the active is a new active;
- B) An Application For Pesticide Registration.
- C) A Confidential Statement of Formula.
- D) A Description of the Manufacturing Process.
- E) A Certification with Respect to Citation of Data.
- F) Physical/Chemical Properties.
- G) Data Requirement Listing.
- H) A Draft Label.
- I) A Report on Cinnamon.

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The requirements under Sec. 158.690, for indoor uses, include Acute Toxicity studies, Fish and Wildlife studies, and Guideline Requirement data for Sections 61, 62 and 63. We are including a discussion of the chemical identity, and a Confidential Statement of Formula. Acute Toxicity and Fish and Wildlife Toxicology on a spice, ingested by humans daily, we believe is unnecessary and, therefore, we request a waiver from this requirement.

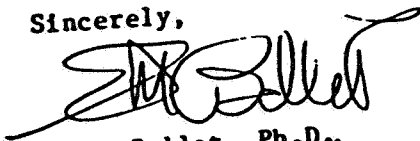
Instead of performing the data requirements on a tree bark which has been consumed by humans for centuries we are providing the Agency the attached reference data which will provide you with exactly what we are dealing with. Also, we are including a copy of our draft label and a Confidential Statement of Formula.

We recognize the unique nature of our request. However, what we are basically requesting is that you register a harmless human food item as a cockroach repellent.

It is recognized that as a result of this submission, the EPA will issue an EPA Registration Number.

If you have any further questions please do not hesitate to call on us.

Sincerely,



E. M. Bellet, Ph.D.
Consultant

Enclosures
EMB/bb

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