



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 13 1992

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**MEMORANDUM**

**SUBJECT:** SACB Review of Additional Information Requested to Support Product Chemistry/Identity Data Requirements for the Registration of Cinnamon (HED Project No. 2-1589; I.D. No. 064714-R Roach Repel; DP Barcode: D175079)

**TO:** Phil Hutton/Mike Mendelsohn  
Insecticide Rodenticide Branch (PM-18)  
Registration Division (H7505C)

**FROM:** J. Thomas McClintock, Ph.D., Microbiologist  
Science Analysis and Coordination Branch  
Health Effects Division (H7509C)

**THROUGH:** Reto Engler, Ph.D.  
Senior Science Advisor  
Health Effects Division (H7509C)

**ACTION REQUESTED:** R.C.G. Inc. has submitted a registration application for Roach-Repel, a product containing cinnamon and [redacted] as active ingredients. SACB previously reviewed the data/information and recommended support of the data waiver requests for specific Product Identity studies PROVIDED THAT the registrant submit data/information on the harvesting procedure and manufacturing process used by the supplier/manufacturer [redacted] for cinnamon (see December 30, 1991 memorandum from J. T. McClintock). The Product Manager is referred to previous memoranda (7 July 1991 memo from J. T. McClintock to P. Hutton/M. Mendelsohn and 26 November 1991 memo from J. T. McClintock to J. Ellenberger) for specific details.

**BACKGROUND INFORMATION:** Since cinnamon was recently classified by the OPP Biotechnology Workgroup as a biochemical pesticide the compound would be subject to the data requirements for biochemicals as outlined in 40 CFR 158.590. On behalf of R.C.G. Inc., Chemical Consultants International Inc. has requested waivers for a portion of the Product Chemistry data requirements (e.g. 151B-17(d) through -17(f), 151B-17(h) through -17(j), 151B-17(m) through -17(p), and 63-10, -14, and -21) and for the acute battery of toxicology studies (152B-10 through -16). Waiver requests were not received for the remaining toxicology studies (152B-17 through -23) as outlined in 40 CFR 158.

**DISCUSSION/CONCLUSION:** In response to the deficiencies noted by SACB Chemical Consultants International Inc. has submitted

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additional information addressing the source and manufacturing process of the subject compound.

The information submitted satisfies the deficiencies noted by SACB. In view of the fact that waivers have been requested for specific acute toxicology data the registrant and manufacturer have ensured the Agency that the subject compound is of food-grade quality and used for human consumption.

**ADDITIONAL CONSIDERATIONS:** Although waiver requests for specific toxicology studies were not received (i.e. 152B-17 through -23) SACB/HED would **NOT** require these studies for the registration of this product.

**MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED**

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