

JAShaughnessy:ow
8/17/71

INERT INGREDIENT INFORMATION IS NOT INCLUDED

Review of Environmental Data
Submitted by Ansul to Support
Non-Food Uses

Background

Products involved are ANSAR 529 EC (47.7% MSMA) and ANSAR 529 MSMA LIQUID PLUS (35% MSMA [REDACTED])

By letter of 10-2-70, we objected to the proposed NEW USE (non-food) in non-bearing vineyards and in non-bearing orchards. Reason was the lack of PR 70-15 data.

The Company has now submitted (5-10-71) a report called "Fate of the Methanearsenates in the Environment."

Review of Submission

Essentially, this is a rehash of previously published papers. The papers show:

1. MSMA is converted to sodium arsenate in soil.
2. Most of the arsenic remains in the soil, but up to 10% will leach out.
3. The arsenic is bound in the soil.
4. Residues in crops grown in treated soil are not significantly higher than the blanks.
5. No interference with soil microorganisms.
6. MSMA does concentrate in fish, but only low levels will reach water.

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Opinion

In my opinion, we cannot accept additional non-food uses of arsenic at this time. Reasons are:

1. Arsenic is under study by Fitzhugh Committee.
2. This is a persistent chemical. No question.
3. Residues are bound in soil.

4. No analyses of fish, rabbit or bird have been submitted.
5. Cannot call this a non-food use because the residues remain permanently in soil.
6. Residues in weeds under the trees will be hazardous to deer and other wildlife.