Date: A

April 16, 1970

Reply to Attn of:

Subject: Cabary1

To: Dr. Frank McFarland
Division of Regulations and Petitions Control
BF-320

As suggested in the in-house meeting on the subject of Cabaryl and its potential as a teratogen (April 7, 1970), the following is suggested for the type of letter that should be sent.

A recent in-house review of the data related to the toxicology of Cabaryl has indicated a need to restudy the problem of the teratogenic potential of this material. As you may be aware, a number of species have been found to respond in a more or less positive manner to teratogenic testing with Cabaryl. These are; a strain of mouse, sheep, dog, guinea pig, chick embryo, duck embryo, and possibly a strain of monkey.

As you are also aware, other mouse strains, rabbits, gerbils, hamsters, and rats have shown a negative response to this material. In light of numerous species responding positively to teratogenic potential of this material, we would ask if Union Carbide has any valid reason to say that Cabaryl is not potentially a teratogen for man.

Unless the data excepting Cabaryl as a teratogen in man are extremely convincing, it becomes of importance to establish what is the most sensitive species in terms of teratogenic response. Having done this it may then be possible, by the introduction of a suitable safety margin to allow for the safe agricultural use of Cabaryl.

Finally, it is important that the real residues be examined in the light of present day technologies and dependent on these data possibly institute further toxicological studies.

H. Blumenthal, Ph.D.

Division of Toxicology
Petitions Review Branch (BF-148)

cc: BF-140

BF-148

BF-216

BF-218

VM-100

HBlumenthal: cms 4-20-70

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