October 6, 1971

FAP #2H2662. Synergized pyrethrins in food processing and food storage areas. Comments on proposal.

Petitions Control Branch and Toxicology Branch

The FMC Corporation proposes that Sections 121.1074 and 121.1075 of the food additive regulations be amended to provide for the use of combinations of piperonyl butoxide and pyrethrins in food processing and storage areas provided that the food is removed or covered prior to use. Section 121.1205 already permits the use of these pesticides in such areas as part of a 3-way combination with MGK-264. No increase in the tolerance levels of 10 ppm for piperonyl butoxide and 1 ppm for pyrethrins to cover residues in foods is contemplated. The petitioner states that the allowable use of the 3-way combination but not a piperonyl butoxide-pyrethrins combination, has created confusion in the food processing industry.

In principle, we have no objections to the proposed amendments. However, we request that the petitioner submit appropriate lawels before making our final recommendations. Since the subject regulations provide that the labels must conform to those registered by the USDA (now EPA), such labels would have to be provided to PRD before the products could be used in any case. If the use patterns are similar to those pertaining to Section 121. 1205, the data in FAP #6H1946 would be adequate to estimate the residue levels of the two components in foods.

For the record, we suggest that PRD be requested to certify that the mixture is useful for the intended purposes

J. Wolff Chemistry Branch Pesticides Tolerances Division

cc: CF-30 (FDA) C. Smith (PRD) Tox. Br. Chem. Br. Dr. Glasgow FAP #2H2662

JWolff:mae 10/6/71 RD/init:JGCummings 10/5/71

