

4-8-81

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CA-810006. 24(c) Registration for the use of chlorothalonil on Chinese cabbage.

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Monterey County (Ca) Department of Agriculture requests a Special Local Needs Registration for the use of Bravo W-75 (75% chlorothalonil) for the control of leaf-spot on Chinese cabbage.

The proposed use would be identical to that currently registered on cabbage: multiple post-emergence applications at the rate of 1.13 lbs act/A.

No tolerance for residues of chlorthalonil has been established on Chinese cabbage. A tolerance of 5 ppm for residues of chlorothalonil and its metabolite 4-hydroxy-2,5,6-trichloroisophthalonitrile has been established on cabbage (40 CFR 180.275). However it has been RCB's position (see memo of G. Beusch 12/10/69) that cabbage does not include Chinese cabbage.

The growth of Chinese cabbage is similar to cabbage but both leaves and heads are elongated and relatively narrow. Heads are less densely packed and leaves are much thinner than in cabbage (Food and Feed Crops of the United States, IR-Bulletin No. 1 New Brunswick N.J. 1971). Consequently, the same use pattern could result in higher residues in or on Chinese cabbage than on cabbage.

Conclusions

1. No tolerance for residues of chlorthalonil has been established on Chinese cabbage.
2. The commodity "cabbage" does not include Chinese cabbage.

Recommendation

In the absence of appropriate tolerance for the commodity Chinese cabbage, we recommended against the proposed registration.

cc: 24(c) SF
Reading file
Circu
Reviewer
Chlorothalonil SF

TS-769:Reviewer:E.Zager:LDT:X77324:CM#2:RM:810:Date:4/8/81
RDI:Section Head:RJH:Date:4/7/81:RDS:Date:4/8/81