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17 MAR 1981

Memorandum

SUBJECT: PP8DE2421 Glyphosate on Cranberries. Amendment of 3/5/81.

FROM: K.H. Arne, Ph.D., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-768)

TO: C. Fletcher, Minor Use Officer
Emergency Response Section
Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

In our review of the subject petition we recommended for the proposed tolerance providing that a label restriction prohibiting the use of harvest flood waters for the irrigation of other crops would be imposed. With this amendment the petitioner has submitted a revised Section B which includes the requested label restriction.

However, the petitioner has also questioned the need for this label restriction for the following reasons:

1. No crops (other than cranberries) are irrigated with harvest flood water.
2. In areas where wet harvesting is practiced the flood water is either returned to a holding pond (Massachusetts, New Jersey and most Wisconsin bays) or into a water marsh (in a few Wisconsin locations).

This information has been confirmed by us with several sources (Dr. William Weller, N.Y.A. State Agricultural Association, Dr. Eldon Stang, U. of Wisconsin, and Dr. Karl Neubert, U. of Massachusetts Cranberry Experiment Station).

In addition, because of the special growing conditions required, few other crops are grown in the same region as cranberries. The above sources have also informed us that commercial fishing is not practiced in areas where cranberries are wet harvested (in any case the water remains in the growers control, it is either on the bog or in a holding pond, and therefore does not enter waters that might be fished).

We conclude that the proposed use does not present a problem with regard to residues of glyphosate in crops (other than cranberries) or in fish. The label restriction is unnecessary.

Tox considerations permitting, we recommend for the proposed 0.7 ppm tolerance for residues of glyphosate and its metabolite, aminomethylphosphonic acid, in or on cranberries.

TS-769:PCB:X.H. Arne:gs:C442:MM.810:3/17/81
cc: RF, CIRC., L. ARNE, WATTS, TOX, EEB, EFB, FDA, PP/DE2421.
RDI: Quick, 3/17/81: Initialed by CLTrichilo