245239
RECORD NUMBER

PESTICIDE CHEMICAL CODE

REVIEW NUMBER

ECOLOGICAL EFFECTS REVIEW

DATE: IN 5/18/89 OUT 8/14/89

FILE OR REG. NO. 45639-51

PETITION OR EXP NO.

DATE OF SUBMISSION 4/28/89

DATE RECEIVED BY HED 5/15/89

RD REQUESTED COMPLETION DATE 8/12/89

EEB ESTIMATED COMPLETION DATE 8/12/89

RD ACTION CODE/TYPE OF REVIEW 661

TYPE PRODUCT(S): I, D, H, F, N, R, S Insecticide/miticide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. D.Edwards (PM 12)

PRODUCT NAME(S) Amitraz

FIGMO

COMPANY NAME NOR-AM Chemical Company

SUBMISSION PURPOSE Registrant response concerning avian reproduction study

PESTICIDE CHEMICAL CODE	CHEMICAL AND FORMULATION	% A.I.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Amitraz Registration Standard; Avian Reproduction Data Requirement; Nor-Am Chemical Company's Resubmission Dated April 28, 1989.

TO: Dennis Edwards, PM 12
Insecticide-Rodenticide Branch
Registration Division H7505C

8/14/89

FROM: Jim Akerman, Chief for H.T. Craven
Ecological Effects Branch
Environmental Fate and Effects Division H7507C

Nor-Am Chemical Company has responded to the Agency's 1/5/89 review of an avian reproduction study submitted in response to the Amitraz Registration Standard. The current submission contains information addressing study deficiencies raised by the Ecological Effects Branch (EEB). EEB has found the information adequate enough to satisfy EEB's concerns except for the unusually high incidence for cracked eggs in the control and treatment groups of the previously conducted study.

The registrant provided an explanation for the cracked eggs by attributing them to physical impact within the study cages. This represents a crucial need to modify study cage designs in order to eliminate the effects of this type of physical impact because it could potentially mask a similar chemical treatment-related effect. EEB notes that another amitraz avian reproduction study (Fink & Beavers; MRID 00072412) resulted in cracked eggs in the treatment groups. While the physical impact explanation is valid, the high incidence of cracked eggs in the historic controls and the effects of physical impact makes it necessary for EEB to continue to require that the current amitraz study be repeated evaluating only the cracked eggs parameter. There exists the need to precisely determine if amitraz does indeed cause avian eggs to crack, regardless of the overall lack of adverse effects to avian reproductive parameters. The ecological hazard assessment is dependant is dependant on precision data.

John Noles 8/11/89
John Noles, Biologist
Ecological Effects Branch