

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

7-30-80

Prowl

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The Ecological Effects Branch requires a chronic aquatic invertebrate study and a field monitoring study prior to its completion of an incremental risk assessment for the use of Prowl on tobacco. These requirements may be considered as conditional requirements of the tobacco registration, meaning that the Ecological Effects Branch concurs with the conditional registration of Prowl on tobacco where the registrant agrees to complete the above studies within a specified time period.

The Ecological Effects Branch requires a chronic aquatic invertebrate study, a field monitoring study, a chronic estuarine invertebrate study and a chronic estuarine vertebrate study prior to its completion of an incremental risk assessment for the use of Prowl on sorghum. These requirements must be met before EEB can consider a conditional registration of Prowl on sorghum.

The Ecological Effects Branch requires a field monitoring study under FIFRA Section 3(c)(2)(B) to support the currently registered uses of Prowl (corn, soybeans and cotton).

It is the understanding of EEB that the marketing of Prowl for use on tobacco is one-two years away. Therefore, considering the time involved in completing a chronic aquatic invertebrate study and a field monitoring study, the Ecological Effects Branch recommends that the registrant complete and submit the requested studies prior to the full scale marketing of Prowl for use on tobacco. Additionally, the Ecological Effects Branch recommends that, as a part of the conditional registration, the registrant agrees to discontinue or stop the marketing of Prowl for use on tobacco if, after the requested studies are submitted and EEB completes its risk assessment, it is determined that this use is an unreasonable hazard to fish and wildlife.

LTouart:ph 7-30-80 TS-769,CM-2,Rm 807 (70320)

CONCURRENCES							
SYMBOL	TS-769	TS-769					
SURNAME	Touart	Bushong					
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