

Petition

PP# SF1606. Dual on Corn. Amendment of 6/1/76
including revised sections B and F.

JUL 16 1976

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THRU: Chief, Chemistry Branch

The revised Section F deletes the tolerance request on sweet corn and corn forage and fodder. The present proposal is for a 0.1 ppm tolerance on corn grain, excluding popcorn.

In line with this change, the revised section B bears the following restrictions: "Use only on corn grown for grain. Do not use on sweet corn or popcorn. Corn forage and fodder should not be grazed or fed to livestock or used for silage. Do not use in Wisconsin."

The restriction against grazing or feeding corn forage or fodder is supported by letters from agricultural workers in major corn growing areas stating that such a restriction is practical. The exception is a letter from Wisconsin stating that, due to early fall frosts, corn planned for grain use may sometimes need to be made into silage. Therefore the restriction against use in Wisconsin was added.

In recent years we have discouraged the use of restrictions against grazing or feeding corn forage or fodder because it is not always practical (as the Wisconsin letter states) and it often denies the farmer use of a valuable portion of the crop merely because of a petitioner's data gap. However, the restriction is used on many older registered labels for corn.

In this case, we understand that the restriction is being used to minimize human exposure until the petitioner completes chronic studies, (per the petitioner's referenced discussions with Drs. Paynter and Rogoff). Since we anticipate that the restriction is therefore only temporary, we find it acceptable.

The revised label also includes an appropriate restriction regarding rotational crops.

Our favorable recommendation was also contingent upon the results of a method trial in our labs. This trial was not completed before our laboratories in South Agriculture Building were closed. Our final recommendation will therefore be delayed indefinitely until the laboratories

are reopened and the trial completed.

Conclusions and Recommendations

1. The revised Sections B and F are acceptable.
2. Because of the laboratory closing, our final recommendation on this petition will be delayed indefinitely until the method is completed.

Donald Reed.

cc:TOX:EEE:FDA:CHM (5)
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