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28 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Metolachlor - Generic Standard - Rotational Crop Restrictions

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The registrant is requesting relief from the blanket 18 month crop rotation restriction currently imposed on crops rotated to Dual 6E used for corn (Letter from J. A. Norton, Ciba-Geigy to H. Jacoby, Registration Division, October 5, 1977).

Ciba-Geigy concedes that residue data on rotational crops indicate small but detectable residues can be found in forage and fodder of rotated small grains and soybeans, but feels that practical crop rotation restrictions can be developed to allow rotation to small grains in the fall following treatment or to soybeans, root crops or small grains during the spring following treatment. To accomplish this, they propose the following amended label restrictions; for Dual 6E. "Small grain may be planted the fall following treatment. Corn, soybeans, root crops and small grain may be planted the spring following treatment. Do not graze or feed forage or fodder from small grains or soybeans to livestock. All other rotational crops may be planted 18 months after application without restriction".

The proposed amended label for Dual 6E and AAtrex contains the following statements:

"Corn and soybeans may be planted the spring following treatment.
Do not graze or feed forage or fodder from soybeans to livestock".

"Small grains may be planted 15 months following treatment".

(WH-568) CARROLL W. COLLIER:mimi:6/26/78

		CONCURRENCES					
SYMBOL	CB	CB					
SURNAME	Cure	OK					
DATE	6/26/78	6/27/78					

Review of the individual studies submitted by Ciba-Geigy to support rotational crop data requirements shows the following:

1. Root crops planted in the spring following treatment are unlikely to contain measurable residues (Based on AGA 3283 I and II (EPA Accession No. 094376); Sumner, D.D. and Cassidy, J.E. (CDL:94385-K); and Sumner, D.D. and Cassidy, J.E., (CDL:94385-F).
2. The grain of soybeans and small grains planted as fall rotational crops to corn are unlikely to contain measurable residues (Sumner, D.D. and Cassidy, J.E., CDL:94385-H; Sumner, D.D. and Cassidy, J.E., CDL:94385-I; EPA Accession No. 094376.) AG-A 3150 I,II; Sumner, D.D. and Cassidy, J.E., CDL:94385-L and EPA Accession No. 094376; AG-A 3244, II; AGA-3554.
3. Forage and fodder from soybeans, small grain crops and corn will contain measurable residues of metolachlor related products, the exact nature of which is unknown (See Generic Standard - Rotational Crop Topical Summary).

The existence of residues in fodder and/or forage from small grains and soybeans rotated with corn when using Dual E requires one or more of the following actions:

- a. Continuation of the current 18 months rotational crop restriction as stated on existing labels.
- b. Establishment of a tolerance for metolachlor and its metabolites in forage portions of small grains and soybeans.
- c. Establishment of tolerances in meat and milk and their byproducts.
- d. Modification of existing label with restrictive statements in regard to feeding of forage and fodder from small grains and soybean foliage grown as crops rotated to corn after treatment with metolachlor.

The only action under consideration at the present time is the last of these items.

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In the opinion of this reviewer, the letters from 25 weed control specialists, as contained in the October 5, 1977 submission, cast considerable doubt on the practicality of the feeding restrictions. Many of the statements contain qualifying phrases suggesting that label restrictions will not in all cases be adhered to. In one case (South Dakota) an even stronger position was voiced wherein doubt was expressed as to the overall practicality of grazing prohibitions.

On the basis of the above, it is recommend that modified labelling not be granted.

Carroll W. Collier