

Memorandum of Conference

Subject: Registration of Dual(R) 8E Herbicide
To: EPA Files 100-597
From: George LaRocca (Acting Product Manager 23) 
Date: August 30, 1978

On February 28, 1978 Ciba-Geigy Corporation requested Registration and General Use Classification for Dual 8E Herbicide (metolachlor) on corn. On an active ingredient basis the proposed labeling for Dual 8E is identical to EPA registered labeling (old regs.) for Dual 6E on corn (100-583). Previously referenced data (old regs) on Dual 6E and new data (Human Tox. and Fish and Wildlife, Residue Chem, Efficacy) on Dual 8E have been found adequate to support registration. From the standpoint of human safety Dual 8E is less hazardous because it causes less eye irritation than Dual 6E. There are no problems with data compensation or trade secret questions. Long-term studies have been previously addressed for corn and are being presently addressed for extended use of metolachlor in soybeans, sorghum etc. via Petitions 5F1606, 7F1913, 8F2098, 8F2081.

The Environmental Safety Section has indicated that due to this products potential to bioaccumulate in fish; its stability in soil and water; leaching characteristics and method of application (surface applied treatment) that a general use classification could not be recommended without evaluation of chronic fish and avian studies. They did indicate that enough data was available to register but not classify. Ciba-Geigy had been previously aware of these data requirements and had already initiated testing. They indicated that these studies would be available by November 1978.

Action: Based upon various meetings between Doug Campt, Herb Harrison, ~~John~~ Adamczyk, George LaRocca and Ciba-Geigy personnel it was agreed that registration could be issued now and a tentative classification

given provided Ciba-Geigy submitted the requested fish and bird studies by December 1, 1978.

This registration is being accepted under Mr. Johnson's May 12, 1977 memo since a similar product (Dual 6E) is already registered; this formulation is less hazardous (than Dual 6E); and currently available data (although not completely satisfying Section 3 or new guidelines) indicates the absence of adverse hazards.