12-3-81

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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: December 3, 1981

SUBJECT: OR-810055 and WA-810052. Section 24(c) registration for the use of Iprodione on crucifers grown for seed in Oregon

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Edward Zager

TO: Henry Jacoby, Product Manager #21
Herbicide-Fungicide Branch
Registration Division (TS-767)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

In our review of 8/24/81 (E. Zager) we recommended against the proposed 24(c) registration of Chipco 26019 Fungicide for use on crucifer crops grown for seed only since no tolerances have been established for residues of Iprodione on these crops.

We have now reconsidered this request. We conclude that these crucifer crops (broccoli, Brussels sprouts, cabbage, cauliflower, kohlrabi, kale, rape, rutabaga and turnips) will not be fit for human consumption at the time the proposed applications are made (full bloom, pod set and just prior to harvest).

However, treated plant parts may be used for animal feed. Consequently in order for the proposed use to qualify as a non-food use the Section 24(c) label must be amended to include a restriction against the feeding of treated plant parts to livestock.

Because Iprodione is only weakly systemic (Pesticide Residues in Food, 1977 Evaluations FAO, Rome 1978) and because of growth dilution, no detectable residues of iprodione are expected in crucifer crops grown from the seeds obtained from treated plants.

1/3
10

Conclusions

1. No detectable residues of Iprodione are expected in crucifer crops grown from seeds obtained from treated plants.

2. Provided a restriction against the feeding of treated plant parts to livestock is added to the Section 24(c) label, the proposed use qualifies as a non-food use.

Recommendation

Contingent upon the imposition of a label restriction against the feeding of treated plant parts to livestock, we have no objections to the proposed 24(c) registration.

cc: iprodione S.F.
Non-Food S.F.
R.F.
Circu
Edward Zager

TS-769:Reviewer:E.Zager:fmm:X77324:CM#2:Rm810:12/3/81
RDI:Section Head:R.J.H.:12/3/81:RDS:12/3/81

D 11

2/3

8-24-81

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

PESTICIDES AND TOXIC SUBSTANCES

DATE: August 24, 1981

SUBJECT: 0R-810055. Section 24(c) registration for the use of Iprodione on crucifers grown for seed in Oregon

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry M. Jacoby, Product Manager #21
Fungicide-Herbicide Branch
Registration Division (TS-767)

THRU: Charles L. Trichilo, Branch Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Rhone-Poulenc Chemical Co. requests a Section 24(c) registration for the use of CHIPCO 26019 Fungicide (50% Iprodione) for control of Alternaria leaf and pod blight and Sclerotinia white rot in cricifer crops (broccoli, Brussels sprouts, cabbage, cauliflower, kohlrabi, kale, rape, rutabaga and turnips) grown for seed only. No tolerances have been established for residues of Iprodione on the above crops.

The proposed use would permit applications at full bloom, at pod set and just prior to harvest at the rate of 2-4 lbs of CHIPCO 26019 Fungicide (1-2 lbs act/per acre). Applications will be made in 20-100 gallons of water/A by ground equipment and in a minimum of 10 gallons of water/A by aircraft.

In general we do not consider the use of pesticide on crops grown for seed only to be a non-food use because of the possibility of treated plants being harvested and used for food or feed before the seed matures and of unused treated seed being diverted to animal feed.

Recommendation

We recommend against this 24(c) registration. Tolerances for residues of Iprodione will have to be established on each of the above crops before CHIPCO 26019 Fungicide may be registered for use on these crops grown for seed only.

cc: Iprodione S.F.
Non Food Use S.F.
R.F.
Circu
Reviewer