

Metalaxyl Amended Use File

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

MAR 16 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: Meeting with Ciba-Geigy, 3/10/93, on Proposed Amendment to Feed Seed Treated with Metalaxyl.
No MRID No. No CBRS No. No DP Barcode No.

FROM: John Abbotts, Chemist *John Abbotts*
Special Review Section II
Chemistry Branch II - Reregistration Support

THRU: Francis B. Suhre, Section Head *Francis B. Suhre*
Special Review Section II
Chemistry Branch II - Reregistration Support

TO: Benjamin Chambliss, PM-21
Herbicide-Fungicide Branch
Registration Division [H7505C]

Attendees: Greg Watson and Larry Treanor, Ciba-Geigy;
Benjamin Chambliss, RD; Bob Quick, CBTS;
Bart Suhre and John Abbotts, CBRS.

Registrant Ciba-Geigy requested the meeting to provide information on seed treatment practices. Registrant has previously submitted a proposal to feed treated seed; my review (DEB No. 7431, 6/27/91) recommended disapproval. Registrant's initial response to the review was provided at a previous meeting (Metalaxyl Amended Use File, 1/22/92). Proposed use is to reduce the rate of treating corn seed with Metalaxyl (Apron 25W), and to allow animal feeding of the seed treated at reduced rates. The previous review recommended disapproval of a proposed amended use because: 1) the established metalaxyl tolerance on corn grain would be exceeded, and 2) the proposed use would establish multiple categories of treated corn seed, one category of which could be fed to livestock, and CBRS was concerned with how the feeding restrictions would be enforced.

At the previous meeting (1/22/92), Ciba-Geigy planned to address point 1) by amending a recently submitted petition (PP 1F3993) to propose a higher tolerance (25 ppm) on corn grain. Bob Quick was present because it is CBTS responsibility to review the petition.



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The Ciba-Geigy presentation included a video on commercial seed treatment and seed bag labeling procedures. The registrant provided copies of a proposed amended label and proposed the use of blue seed tags only for corn seed that could be legally fed. The amended label would still establish multiple categories of treated corn seed, including categories treated at a higher rate, 1-4 oz (0.25-0.5 oz ai) per 100 lb of seed, which could not be fed to livestock; and a category treated at 0.13 oz (0.0325 oz ai) per 100 lb of seed, which could be fed to livestock.

Representatives of the Chemistry Branches reiterated a concern about how restrictions on feeding seed would be enforced, and cited instances where seed was improperly diverted for feed with deleterious effects, including federal purchase of contaminated milk. Bart Suhre noted that with the categories of seed treated at different rates, an appropriate means of control would be to establish tolerances on corn that reflected the highest application rate. Bart Suhre also noted that an Agency decision would apply to all seed treatment companies, and recommended that Ciba-Geigy work with the American Seed Trade Association to develop a generic proposal. Ciba-Geigy indicated that it would pursue coordination with other seed treatment companies and work to address the concerns raised.

cc:Circ, Abbotts, RF, Metalaxyl SF, Metalaxyl Amended Use File
RDI:FBSuhre:3/10/93:MSMetzger:3/11/93:EZager:3/15/93
H7509C:CBII-RS:JAbbotts:CM-2:Rm805A:305-6230:3/15/93