



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

JAN 22 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM:

SUBJECT: Meeting with Ciba-Geigy on Proposed Amendment to Feed
Seed Treated with Metalaxyl.
No MRID No.

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

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

TO: Chemistry Branch Files

Attendees: Karen Stumpf and Robert Bassi, Ciba-Geigy
Susan Lewis and Benjamin Chambliss, RD
Bart Suhre and John Abbotts, CBRS;
Rick Loranger, CBTS

Registrant Ciba-Geigy requested the meeting to discuss their response to my review (6/27/91, DEB No. 7431) and their plans to address the conclusions of the review. 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 cattle but not poultry, and CBRS was concerned with how the feeding restrictions would be enforced.

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. Rick Loranger was present because CBTS will review the petition, and he indicated that amending the petition, rather than submitting a new petition, seemed an acceptable approach. To address point 2) in part, Ciba-Geigy indicated that a new poultry feeding study had been submitted as part of reregistration (MRID 42115809), and the higher tolerance on corn would require higher tolerances for poultry meat and meat byproducts. Rick indicated that a tolerance for meat byproducts other than liver might not be necessary, and offered to provide advice on this matter at a later date.



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Ciba-Geigy noted that the present label for treated seed requires an EPA-approved dye on the seed, and asked for advice on whether the treated seed that would be allowed for feeding should be dyed or undyed. Susan Lewis, RD, offered to provide advice on this matter at a later date.

Ciba-Geigy submitted copies of a proposed amended label. This would still establish four different categories of corn seed (field, sweet, and popcorn):

- 1) Seed treated at 1-2 oz (0.25-0.5 oz ai) per 100 lb of seed; feeding would be prohibited;
- 2) Sweet corn seed treated at 1 oz ai per 100 lb seed; feeding would be prohibited;
- 3) Hybrid field corn seed treated at 0.15 oz (0.0375 oz ai) per 100 lb seed, and also treated with other products not registered for feeding; feeding would be prohibited; and
- 4) Hybrid field corn seed treated at 0.0375 oz ai per 100 lb seed, which would be allowed for feeding to cattle and poultry.

In actual practice, seed treated in category 4) would also be treated with other products, whose registrants also intend to pursue amendments to allow feeding of treated seed. CBRS continued to express its concern that feeding restrictions could be adequately enforced. Rick Loranger noted that we are more comfortable with feeding restrictions linked to seed treatments made by growers. Our concern rests with the transmission of feeding restriction information to growers following application of the pesticide at commercial seed treatment facilities. Ciba-Geigy offered to supply further information on operations and control procedures at seed treatment facilities.

cc:Circ, Abbotts, RF, Metalaxyl SF, Metalaxyl Amended Use File,
PIB/FOD (C.Furlow)

RDl:FBSuhre:1/14/92:DFEdwards:1/14/92:EZager:1/21/92
H7509C:CBII-RS:JAbbotts:CM-2:Rm812A:305-6230:1/22/92