U. S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DATE: 12/3/2002

MEMORANDUM

SUBJECT: JAU 6476; EPA, PMRA, and Bayer Residue Chemistry Meeting. **Comments concerning Memorandum of Understanding (dated: 11/11/2002).**

DP Barcode:	D287156	PRAT Case:	None
Submission No.:	None	Caswell No.:	None
Chemical No.:	Not Available	Class:	Fungicide
Trade Name:	None	EPA Reg No.:	Not Registered
40 CFR:	Not Registered		
MRID No.:	None		

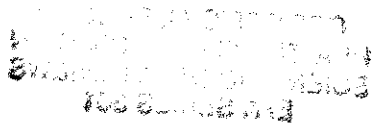
TO: Terri Stowe, PM Team 21
RSB/RD (7505C)

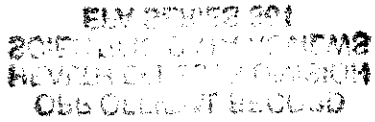
FROM: William D. Wassell, Chemist
RAB3/HED (7509C)

THRU: Stephen C. Dapson, Branch Senior Scientist
RAB3/HED (7509C)
01/13/2003

Introduction:

Members of HED (Clark Swentzel, Stephen Dapson, Amelia Acierto, and William Wassell), RD, Pest Management Regulatory Agency (PMRA), Health Canada (by telephone), and representatives of Bayer CropScience (Erhard Weber, Matthias Haas, John Murphy, Francis Duah, Ghona Sangha, Russ Christenson, Clive Halder, Tammy Sabbert, Todd Denofreo (via telephone at PMRA), Karen Pither (via telephone at PMRA), and Melvin Tolliver, met on September 10, 2002 to discuss residue chemistry and toxicology issues associated with the new active ingredient JAU 6476 (also called prothioconazole). Bayer has submitted a Memorandum of Understanding (MOU; dated: 11/11/2002) which outlines Bayer's understanding of what took place during the meeting. The MOU is included as Attachment 1.





Detailed Considerations:

Bayer stated that the purpose of the meeting was to seek agreements and/or guidance on the following issues concerning JAU 6476: (1) proposal for livestock residues of concern; (2) waiver for poultry feeding study; (3) guidance on cattle feeding study; (4) proposal of toxicological end-points; (5) end-point selection and approach for dietary risk assessment; (6) approach to occupational risk assessment based upon the realistic exposure scenario; (7) proposal to conduct DNT Study with the most relevant metabolite SXX 0665 (desthio metabolite); and (8) sufficiency of data with metabolite SXX 0665.

Bayer should be informed that the Agency cannot make formal agreements/decisions concerning JAU 6476 until all data are submitted and reviewed.

Concerning Items 1, 2, and 3: (proposal for livestock residues of concern; waiver for poultry feeding study; and guidance on cattle feeding study, respectively.)

Bayer should be made aware that since this chemical is being submitted as a NAFTA Joint Review Chemical, **any decisions made concerning the residue of concern will be made in conjunction with input from representatives of Canada and Mexico. Every attempt will be made to harmonize the residue of concern decisions with Canada and Mexico as this will facilitate sharing of reviews.**

Bayer has developed an analytical method for use with livestock commodities that determines total residues of JAU 6476 plus JAU 6476 conjugates, JAU 6476-4-hydroxy plus its conjugates, and JAU 6476-desthio plus its conjugates as JAU 6476, JAU 6476-4-hydroxy, and JAU 6476-desthio, respectively. Presumably, these residues are being proposed as the residues of concern in livestock commodities.

Bayer has conducted poultry metabolism studies with exaggerated dose rates of approximately 1300x (phenyl label) and 1200x (triazole label). Liver and kidney tissues contained the highest total radioactive residues (TRR) at 4.5 and 4.1 ppm, respectively.

HED Comments:

Based upon the information presented at the meeting, it appears that the analytical method developed by Bayer for use with livestock commodities determines a majority of the TRR determined in the ruminant metabolism study. HED agreed that Bayer's approach for the residue of concern in livestock seems reasonable.

Based upon the poultry metabolism study data presented at the meeting, HED agreed that a poultry feeding study is probably not required for JAU 6476 at this time.

The MOU also states that HED agreed with Bayer's approach to determining the dietary burden for livestock exposed to JAU 6465 treated commodities. Bayer has submitted a Proposal for Dietary Burden Calculation (dated: 11/4/2002) which outlines Bayer's proposal for the ruminant feeding study utilizing JAU 6476. This submission is the subject of a separate co-pending review (Memo, 11/26/2002, W.D. Wassell, D D286914).

Concerning Items 4, 5, 6, 7, and 8: (proposal of toxicological end-points; end-point selection and approach for dietary risk assessment; approach to occupational risk assessment based upon the realistic exposure scenario; proposal to conduct DNT Study with the most relevant metabolite SXX 0665; and sufficiency of data with metabolite SXX 0665; respectively.)

Bayer was instructed that decisions concerning end-point selection, risk assessment, need for a DNT study, and sufficiency of the data for SXX 0665 are made by the primarily by the Hazard Identification Assessment Review Committee (HIARC) once the toxicological data are reviewed. Thus, it would be premature for HED to comment on these issues prior to review of the data.

Attachment 1: Correspondence from M.K. Tolliver, Bayer to Terri Stowe, EPA, dated: 11/11/2002.

cc: WDWassell, RAB3 RF, New Chemical Correspondence File

RDI: S.C. Dapson: 12/02/2002.

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R059516

Chemical:

PC Code:
HED File Code 11000 Chemistry Reviews
Memo Date: 12/03/2002 12:00:00 AM
File ID: DPD287156
Accession Number: 412-04-0047

HED Records Reference Center
04/05/2004