



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

AUG 16 1985
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 100-631. Cyromazine (Larvadex®) feed-through for poultry. Label revision in response to FR notice. [RCB# 1110]

FROM: Richard Loranger, Chemist *R. Loranger*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Adam Heyward, PM Team 15, IRB
Registration Division (TS-767)

In response to the 5/15/85 Federal Register notice announcing the Agency's decision to issue a conditional registration for the feed-through use of cyromazine in poultry, CIBA-GEIGY has submitted a revised label for Larvadex® Premix (0.3% active ingredient). We have been requested to review the label for consistency with the FR notice and cyromazine tolerances.

On the same date EPA announced establishment of a 0.25 ppm tolerance for combined residues of cyromazine (N-cyclopropyl-1,3,5-triazine-2,4,6-triamine) and its metabolite melamine (1,3,5-triazine-2,4,6-triamine) in or on eggs. Tolerances were also established for residues of cyromazine in poultry fat, meat and meat byproducts at 0.05 ppm [40 CFR 180.414] (page 20371, FR Volume 50). Simultaneously, 21 CFR 561 was amended by addition of §561.99 which permits use of cyromazine as a feed additive for layer hens at a rate not greater than 0.01 lb per ton of feed (equivalent to 5 ppm). This feed additive regulation also stipulated that the administration of treated feed must be stopped at least 3 days (72 hours) prior to slaughter. Residue Chemistry Branch has concluded that this pre-slaughter interval is practical and that the above tolerances for eggs and poultry tissues are acceptable in conjunction with such a PSI (PP#2F2707/FAP# 2H5355, A. Smith, 5/3/85).

As part of the conditional registration the Agency has stipulated various labeling requirements for Larvadex (page 20381, FR Volume 50, 5/15/85). These are discussed below along with CIBA-GEIGY's responses and our conclusions/comments.

Label requirement: The front panel must contain the statement "For fly control in and around caged (chicken) layer operations only."

CIBA-GEIGY's response: The label has been revised to state "For fly control in and around poultry (chicken layer operations only)". The word "caged" has been dropped since modern poultry farms often involve the production of chickens on slatted flooring which allows the manure to drop into pits below. "Thus, the limitation to "caged" chickens is inappropriate."

RCB's comments: According to "Farm Poultry Management", USDA, Farmers' Bulletin 2197 (1977), two housing systems are employed for poultry-"cages" and "floor housing". The latter allows birds to move freely on the floor and may be adapted to growing and keeping any type of poultry flock (layers, breeders, broilers, etc). As long as the 5 ppm feed level and 3 day pre-slaughter interval are observed, we do not expect any significant difference in cyromazine residues between caged and non-caged poultry or their eggs. Therefore, from the viewpoint of whether tolerances will be exceeded, RCB has no objections to exclusion of the word "caged" on the label. However, we note that other groups within OPP may have suggested this restriction to reduce exposure to the public by decreasing the number of birds to be treated.

Label requirement: The label must state "Note.-Do not feed Larvadex® treated feed to broiler poultry." and "Larvadex® use is limited to use as a feed-through in chickens only and may not be fed to any other poultry species."

CIBA-GEIGY's response: The above statements have been incorporated into the label. The phrase "in poultry" has been added after "Larvadex use" so as not to exclude future use in other animals.

RCB's comments: We have no objections to the slight modification made in the feed-through limitation statement.

Label requirement: "Meat and eggs from breeders treated with Larvadex are not to be used for food."

CIBA-GEIGY's response: This statement is not on the label as we consider it "inappropriate and without merit". Tissues and residues therein will not differ for breeders versus chickens producing eggs for human consumption. The PSI of 3 days would also apply to breeders. "We urge your reconsideration of this important matter."

RCB's comments: We agree with the registrant that residues of cyromazine in eggs and tissues of breeders will not differ from those in layers producing eggs for human consumption. The tolerances will not be exceeded. Therefore, RCB does not object to the absence of the breeder restriction. However, as in the

one comment above, we note that this restriction may have been imposed to decrease exposure to the public by lowering the frequency of residues being found (even though the magnitude of such residues will not be affected).

Label requirement: Incorporate the wording from the CIBA-GEIGY publication "Larvadex® Fly Control for Egg Laying Poultry" into the directions for use section.

CIBA-GEIGY's response: Beginning with the General Information section, wording substantially similar to the flyer has been incorporated into the label.

RCB's comments: The label now includes comments on such areas as eliminating fly breeding sites and determining the threshold of fly tolerance. We have no adverse comments on this portion of the label.

Label requirement: The Larvadex feed formulator must inform the feed user in writing that treated feed must be removed from layers at least 3 days before slaughter. The following label statement is suggested for use on treated feed containers:

This poultry feed is formulated with 5 ppm (0.01 lb/ton) [or 1.5 ppm (0.003 lb/ton) if appropriate] cyromazine. Treated feed must not be fed to layers for a minimum of 3 days (72 hours) before slaughter for food.

CIBA-GEIGY's response: A new label section entitled "Important Note to Feed Mill Operators" has been added. This includes the above instructions for feed formulators and the recommended statement for feed containers.

RCB's comments: The registrant has complied with this request. In addition to the instructions for the formulator, the label includes the statement "To avoid illegal residues, Larvadex treated feed must be removed from layers at least 3 days (72 hours) before slaughter." under the section "When and how to use Larvadex". Therefore, the required PSI appears twice on the label.

Label requirement: "Manure from chickens fed Larvadex may be used as a soil fertilizer supplement. Do not apply more than 5 tons of manure per acre per year. Do not apply to small grain crops that will be harvested or grazed."

CIBA-GEIGY's response: The above paragraph has been included with the additional phrase "or illegal residues may result" appearing after "grazed".

RCB's response: We have no objections to the slight revision of the manure fertilizer statement.

Label requirement: The labeling should contain a description of the appropriate doses for the pests to be controlled.

CIBA-GEIGY's response: The label states that 1 lb of Larvadex Premix should be mixed per ton of feed for control of houseflies and the soldier fly. For the lesser housefly the rate is 3.33 lbs of Premix per ton of feed.

RCB's comments: The above statements are an adequate description of the required doses for the various flies.

Label requirement: The Agency will require that the interrupted method of dosing be incorporated into the directions for use. The phrase "and continue treatment through the fly season" must be deleted as a condition of registration.

CIBA-GEIGY's response: The statement has been removed and replaced by the sentence "Begin feeding when adult flies become active and continue as prescribed through the fly season." under the Housefly, soldier fly instructions. For the lesser housefly the label instructs to "Feed at this rate for as long as this pest is a problem." Under "When and how to use Larvadex" the interrupted dosing scheme is described. The material is to be fed continuously for 4 to 6 weeks. If little or no maggot activity is observed in the manure pits at that time, one of two programs is recommended: (1) Discontinue Larvadex and monitor the manure pits. If maggots again become active, repeat the procedure. or (2) If maggot activity can't be monitored diligently, interrupted use regimes of 5-7 days on and 5-7 days off Larvadex are suggested.

RCB's comments: We feel that the registrant has not adequately emphasized the interrupted dosing scheme. The housefly/soldier fly instructions still state "continue treatment as prescribed through the fly season". Even though interrupted dosing is described later on the label, this phrase could be interpreted as continuous use being permitted. The same holds for the lesser housefly where it states "Feed at this rate for as long as this pest is a problem." We suggest that the phrase "through the fly season" be replaced by "below under When and how to use Larvadex" in the "Housefly, soldier fly" section under "Blending and Feeding Larvadex". For the Lesser housefly portion of the label the phrase "for as long as this pest is a problem" should be replaced by "as prescribed below under When and how to use Larvadex". We wish to emphasize that these changes are not necessary to ensure that residues of cyromazine plus melamine do not exceed the tolerances. The revisions are needed to reduce public exposure by decreasing the frequency with which residues will be incurred. The maximum levels of residues will not be changed; they will merely occur less frequently.

CONCLUSIONS AND RECOMMENDATION

1. The label submitted by CIBA-GEIGY will not result in residues of cyromazine plus melamine exceeding the established tolerances of 0.25 ppm for eggs and 0.05 ppm for poultry meat, fat and meat byproducts.

2. The interrupted dosing scheme designed to reduce public exposure (by decreasing the frequency with which residues will occur) has not been adequately emphasized. Suggested label revisions to correct this situation appear in the last paragraph of page 4.

3. The proposed elimination of the word "caged" (see top of page 2) and deletion of the restriction against breeders (see bottom of page 2) will increase the frequency with which residues will occur, although (as noted in Conclusion 1) residues will not exceed the established tolerances.

Based solely on the issue of whether tolerances will be exceeded, we have no objections to the submitted label. However, as noted in Conclusions 2 and 3, the proposed label does not fit the intent of the Federal Register notice and will result in a higher frequency of residues. Therefore, we defer to the Product Manager as to what action should be taken at this time.

cc: Circu, RF, Cyromazine SF, PP#2F2707, Loranger, PMSD/ISB
RDI:Section Head:ARRathman:8/15/85:RDSchmitt:8/15/85
TS-769:RCB:R.Loranger:557-7324:RAL:CM#2:RM.810>Date:8/15/85