

% A.I.



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

September 8, 1989

SUBJECT: Proposed Experimental Use of Avermectin
Reg No: 62476-EUP-12

FROM: James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division H7507C

TO: George LaRocca PM 15
Insecticide/Rodenticide Branch
Registration Division H7505C

The EEB has been asked to comment on the need for a Section 5 Experimental Use Permit to experiment with the control of African honey bees.

Experimental Program

See attached Appendix for a description of the proposed experiment.

EEB Response

Two issues must be addressed, one is the chemical involved and the other is whether an EUP is needed.

Is EUP Required?

The EEB does not typically make policy on when a particular experiment with a pesticide requires an Experimental Use Permit under Section 5 of FIFRA. It seems the criteria of less than 10 acres is rather subjective and may not be applicable to certain types of uses. There certainly is a significant difference between the potential for a pesticide to transport, by drift, runoff or via some biological vector (e.g. bees), beyond the 10-acre limit and actually applying a pesticide on an entire 10-acre plot. It would seem that if an exception to the 10-acre criteria was ever applicable, this would be the case.

If it is determined that an EUP is required, the next issue becomes relevant.

2

Which Chemical is Involved?

The Data Review Record, the referenced labels and the note from George LaRocca dated August 21, 1989 all refer to avermectin and formulations containing avermectin. However, all correspondence from the Arizona Commission of Agriculture and Horticulture refer to Ivermectin and products containing Ivermectin. See letters dated March 18, 1988 and March 21, 1988, and other documentation attached to those letters. It would seem EPA should identify which chemical will be used as well as determine whether an EUP is required. The PM has correctly stated that Avermectin is currently registered by EPA, however, Ivermectin is not registered by EPA, and EEB does not have any information in the files on that chemical.

Risk Assessment

Regardless of whether it is determined that this experiment requires an EUP or not, the EEB will comment on expected potential risk. Whether the chemical is Avermectin, which is extremely toxic to aquatic organisms and toxic to mammals, or Ivermectin, for which the EEB has no information, the limited exposure potential is expected to result in minimal effects to nontarget organisms.

If you have questions, please contact Dan Rieder.