

246253
246254
RECORD NO.

128501
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 6-9-89 OUT SEP 27 1989

FILE OR REG. NO. 10182-ETT; 10182-ETA
PETITION OR EXP. NO.
DATE OF SUBMISSION 5-25-89
DATE RECEIVED BY EFED 6-7-89
RD REQUESTED COMPLETION DATE 7-7-89
EEB ESTIMATED COMPLETION DATE 7-7-89
RD ACTION CODE/TYPE OF REVIEW 121

TYPE PRODUCT(S) : I, D, H, F, N, R, S Herbicide
DATA ACCESSION NO(S). 411114-01,-02,-03, -04
PRODUCT MANAGER NO. R. Taylor (25)
PRODUCT NAME(S) Sulfosate: Touchdown® Concentrate and 4LC

COMPANY NAME ICI Agricultural Products
SUBMISSION PURPOSE Submission of data in response to
previous EEB review of noncrop uses

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
128501	sulfosate	52.2%

EEB BRANCH REVIEW

PESTICIDE NAME: sulfosate

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

In response to the 1-30-89 EEB review, the registrant has submitted plant protection studies and additional data concerning chronic aquatic studies previously submitted. The plant protection studies have been reviewed separately (see 7-10-89 and 9-7-89 EEB reviews) and will not be covered here.

101 Hazard Assessment

101.2 Likelihood of Adverse Effects to Non-target Organisms

See 1-30-89 and 1-21-87 reviews for full assessment. Reviews of data on chronic aquatic studies in the present submission (see below) indicate an MATC for D. magna of $> 1.2 < 2.1$ mg/L and an MATC for rainbow trout of $> 51 < 101$ mg/L. Thus, based on the exposure analysis described in the 1-30-89 review, sulfosate does not appear to pose a chronic aquatic risk at the application rate proposed.

101.3 Endangered Species Considerations

The formal consultation for the noncrop herbicide cluster, referred to in the 1-30-89 EEB review, is no longer active due to the new species-based approach being taken under OPP's Endangered Species Implementation Program. For this reason, EEB will informally consult with USFWS to obtain a list of species, if any, USFWS considers would be in jeopardy under the proposed registration. Given the restricted nature of the proposed noncrop use (around the farm), the number of species may be sufficiently limited that the registrant could avoid a "may effect" situation by adding label restrictions to avoid exposure potential (personal communication with W. Gill and L. Turner).

101.4 Adequacy of Toxicity Data

Accession Number	Study Type & Material	Results	Category	Reviewer
408937-04	Fish Early Life	MATC $> 51 < 101$	Core	Rhodes
411114-02	Stage/Tech.	mg ai/L		
408937-05	Invert. Life-	MATC $> 1.2 < 2.1$	Core	Rhodes
411114-01	Cycle/Tech.	mg ai/L		

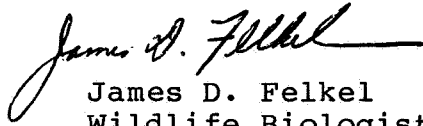
101.5 Adequacy of Labeling


No new labeling was included with this submission to EEB.

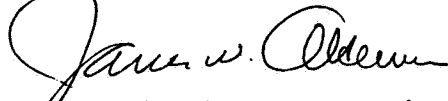
103 Conclusions

Additional data contained in the present submission have enabled the two chronic aquatic studies to be categorized as Core. No further avian or aquatic data are required at this time. Sulfosate is not expected to pose an acute or chronic risk to birds or aquatic organisms under the proposed application rate on noncropland around the farm.

As an herbicide, sulfosate would pose a risk to federally-listed endangered or threatened plants if exposed. Results of consultation with USFWS will be forwarded to you when available.

 9-26-89
James D. Felkel
Wildlife Biologist
Section #4
EEB/EFED

 4/26/89
Harry Craven, Head
Section #4
EEB/EFED

 9/27/89
James W. Akerman, Chief
EEB/EFED

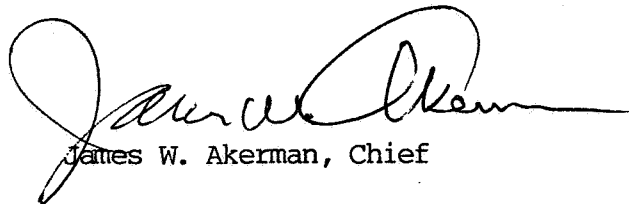
SEP 27 1989

Addendum to the Sulfosate Review

To address the endangered species issue (plants) raised by the EEB reviewer, I contacted Tom Adamczyk, Deputy Chief, Fungicide-Herbicide Branch. I asked Mr. Adamczyk if sulfosate was identical (or substantially similar) to glyphosate. He responded in the affirmative. He also indicated that glyphosate has numerous uses, but the proposed use for sulfosate was limited to non-crop vegetation control "around farm building, etc."

The EEB reviews state clearly that ICI has satisfied all the data requirements to support the proposed use. In my opinion and for purposes of risk assessment, this action should be considered as a me-too product. For example, if this were the Nth registration for a glyphosate product, RD would process the application without any EEB review (following review procedures for products that are identical or substantially similar to those currently registered). It is my opinion that no endangered species review is needed for this product at this time. Such a review needs to be conducted at the time of a generic review of the active ingredient to include all registered uses.

This addendum applies to EEB reviews for Touchdown Concentrate and 4LC formulations (10182-TT and 10182-ETA).



James W. Akerman, Chief

Ecological Effects Branch

Environmental Fate & Effects Division