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

MAY 8 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Low Volume/Minor Use Waiver Request for Sabadilla Alkaloids

TO: Geraldine Werdig, Chief
Data Call-In Staff
Registration Division (TS-767)

FROM: Margaret L. Jones *M. L. Jones 5/1/86*
Review Section III
Toxicology Branch (TS-769)

THRU: William Burnam, Deputy Chief
Toxicology Branch (TS-769)

*W. Burnam
5/8/86*

Chemical: Sabadilla Alkaloids

Caswell No.: 728

Record No.: 169124, 165183

Petitioner: Dunhill Chemical Co.

Action Requested: Determine whether toxicology data requirements can be waived for Sabadilla alkaloids because the petitioner claims low volume/minor use exists.

Conclusion: Sabadilla alkaloids are used on citrus, which constitutes a food use. Normally, a full complement of toxicity data are required for registration of a food use pesticide. Although a case of low volume/minor use applies to this chemical, toxicology data requirements cannot be automatically waived. At present, there are no data on this pesticide in the Toxicology Branch files. Certain data are necessary in order to decide whether parts of the battery of chronic, reproduction, teratogenicity, and oncogenicity studies normally required for registration can be waived. The minimum data required are outlined in the attached 5/2/86 memorandum from Burnam to Werdig. *Barton*



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SUBJECT: Low Volume/Minor Use Waivers - Follow-up Memo

TO: Anne Barton, Deputy Director
Hazard Evaluation Division (TS-769)

This is an addendum to my March 12, 1986 memo on the same subject of data waivers. Even though tolerances and food uses exist for certain pesticides, there may be cases in which a combination of factors allows for a reduction in the total toxicological data base needed. Such factors include the following:

1. Available acute, subchronic, teratogenic and mutagenic do not indicate a problem or predict a future problem.
2. Structure activity does not predict a major problem.
3. Residue data on crops shows minimal amounts present with no secondary residues in meat, milk, poultry or eggs.
4. Relevant human experience indicates safety.
5. Exposure to applicators and bystanders is low.

The minimum toxicological data needed prior to a discussion of data waivers for food use pesticides are the following:

1. Acutes
2. Subchronic rat feeding study
3. Subchronic dog feeding study
4. Teratology study in one species
5. Mutagenicity battery

These should be of Core-minimum quality or better.

For non-food use pesticides, the minimum data needed are the following:

1. Acutes
2. Subchronic dermal
3. Teratology study in one species
4. Mutagenicity battery
5. Exposure information

This is consistent with drafts of our "Non-food Use Data Requirements" paper and is tiered based on the outcome of these tests and evaluation of exposure.

I believe that we should require these above mentioned basic tests initially and encourage the submission of actual residue data and, where applicable, processing studies. After all such information are evaluated, it then may be possible to determine if such waivers are reasonable.

Wm L Burnam 5-2-86

William L. Burnam, Deputy Chief
Toxicology Branch
Hazard Evaluation Division (TS-769)

cc:

Dr. Farber
Bob Coberly