US EPA ARCHIVE DOCUMENT

IRB BRANCH REVIEW - TSS

Record Number(s)

201277

IN 9/18/87 OUT 9/24/87

EFFICACY

FILE OR REG. NO. 7679-23

PETITION OR EXP. PERMIT NO.

E DIV. RECEIVED 6/17/87

DATE OF SUBMISSION 6/3/87

DATE SUBMISSION ACCEPTED 9/18/87

TYPE PRODUCTS(S): I[x], D, H, F, N, R[x], S

DATA ACCESSION NO(S). none

PRODUCT MGR. NO. 16 or 32

PRODUCT NAME(S) ~~7679-23~~ AMERKAN BRAND NICOTINE SULPHATE

COMPANY NAME American Brand Chemical Co.

MISSION PURPOSE Add claim

CHEMICAL & FORMULATION 10% Nicotine Sulphate liquid

Efficacy Review: AMERICAN BRAND NICOTINE SULPHATE, 7679-23
American Brand Chemical Co.
Bonham, TX 75418

200.0 INTRODUCTION

200.1 Uses

A 10% Nicotine Sulphate liquid concentrate registered for control of:

1. aphids (plant lice), scale crawlers, leafhoppers, thrips, leaf miners, mealy bugs, rose slugs, spider mites, and lace bugs on roses carnations, gladioli, iris, chrysanthemums, lillies, asters, Nasturtium, hollyhocks, dahlias, snapdragons, pansies, tulips, zinnias, geraniums, boxwood, marigold, mums, sweet peas, ferns, Spirea, cedar, "and other ornamental shrubs and flowers" (except violets);

2. aphids, leafhoppers, and budmoths on tomatoes, apples, and pears,

3. squash bug nymphs on Summer and Winter squash;

4. chinch bug nymphs on sweet corn:

5. thrips on onions;

6. aphids, leafhoppers, and thrips on beans, peas, cucumbers, and melons "(including Cantaloupe, Muskmelon, Watermelon, and other melons)";

7. aphids and leafhoppers on eggplant, peppers, spinach, cabbage, turnips, currants, apricots, cherries, peaches, strawberries, oranges, lemons, grapefruit;

8. asparagus beetle larvae on asparagus; and

9. ants in lawns.

200.2 Background Information

See product jacket. This product was initially registered on 8/16/82. Its label notes that the product "provides an effective way to kill pests . . ." To this label, registrant proposes to add the following claim

> "SQUIRREL REPELLENT: When used as directed above, American Brand Nicotine Sulphate will also repel squirrels."

201.0 DATA SUMMARY

No efficacy data were submitted. Usually, none are required for claims to control or repel vertebrate species that are not considered to be "public health pests. However, this claim is not found on any currently registered Nicotine Sulphate product's label and appears to be new to the Agency. I would like to see something more to support the claim than the registrant's assertion:

"When used as directed control insects on Flowers, Shrubs, Vegetables and Fruits, American Brand Nicotine Sulphate also repels squirrels. We trust you will find this amendment acceptable, thus helping to solve another gardening problem."

The registrant confidently claims that the product will repel squirrels. One expects (hopes?) that there is basis for this claim. If the product really repels squirrels as well as is implied, the registrant should have no trouble documenting the effect.

As proposed, the squirrel claim is vague regarding sites and application directions.

202.0 CONCLUSIONS

1. Submit efficacy data to support the claim that the product will repel squirrels. These data must be obtained through research studies. Testimonials from "satisfied customers" are not acceptable to support a new claim. If you do not have such data on hand, you are advised to submit a proposed protocol for these studies before undertaking them.

2. If you decide to support the squirrel claim, the use directions for repelling squirrels must be expanded so as to indicate the species or types of squirrels to be repelled, the methods of application for repelling squirrels (if different from those for killing insects), and the duration of effectiveness that can be expected from each treatment.

William W. Jacobs
Biologist
IRB/TSS
September 24, 1987