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

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MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Response to Registrant's Comments to TPTH Updated Benefit Assessment

FROM: Tara Chand-Goyal, Ph.D., Plant Pathologist
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Biological and Economic Analysis Division (7503C)

Tara Chand-Goyal
9/2/99 sent

THRU: Susan Lawrence, Chief
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TO: Loan Phan / Robert McNally
Special Review and Registration Division (7508C)

The Biological and Economic Analysis Division (BEAD) recently updated the TPTH benefit assessment in the Position Document 2. The assessment was provided to SRRD on August 4, 1999. We have received and reviewed the registrant's recent rebuttal dated August 25, 1999, and have the following comments.

The most outstanding comment by Wm. Ronald Landis on behalf of the TPTH Task Force is that the references and information relied on by the division to compile the assessment are outdated. Since the Agency relies on the expertise of the industry, growers, and other impacted organizations, it is critical that we receive updated information and data from the Task Force to supports their August 25 comments as follows:

a) The TPTH Task Force states that TPTH is the **only** non-systemic contact fungicide with a multi-site mode of action that is registered on potatoes, sugarbeets, and pecans that can give control under high to extreme disease pressure. The Division has not seen any data that supports the industry's claim that TPTH can control disease under extreme disease pressure, or that other alternatives mentioned in the review fail to give adequate control under these conditions. We invite the industry to provide the data that supports these claims.

b) They also state that TPTH is the only registered alternative that has anti-sporulant activity for late season application. Three newly registered fungicides (azoxystrobin, cymoxanil, and dimethomorph) have been claimed to have systemic, curative, and anti-sporulant

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activity. If the TPTH industry has data which contradicts these claims, then documentary evidence should be submitted to the Agency.

c) The Task Force reiterates the reviewer's point that resistance management is an issue of concern. Given the currently registered alternatives, the reviewer believes that adequate tools exist to support resistance management in potatoes. On pecans and sugarbeets, TPTH may play a more visible role because of its low price and fewer fungicides are registered for use on these crops. The industry is encouraged to provide new data which indicates a lack of adequate resistance management tools in each of the commodity areas.

Recent consultations with commodity experts support the Division's conclusions outlined in updated benefit assessment. A part of our review, we strive to obtain recent information from knowledgeable experts. Since the Task Force's primary point is our lack of recent, updated information, we encourage them to support recently generated data to support their claims.