DATE:  IN  OUT  IN  OUT  IN  OUT  11/11/74  OUT  11/26/76
FISH & WILDLIFE  ENVIRONMENTAL CHEMISTRY  EFFICACY

FARM OR NUR. NO.  241-243
PENSION OR TOLL NUMBER

DATE SENT TO FARM:  10/26/76
DATE RECEIVED:  10/25/76

FARM NAME OR LOCATION
SHOPER'S FARM

PRODUCT(S):  I, D (H) F, H, R, S  Herbicide

PLANTER NR.  Bob Tayler (25)
PRODUCT NR(S)  Prowl

COMPANY NAME  American Cyanamid Company

SUBMISSION BOARD:  Extend period of application from 60 to 140 days prior to planting and add Kochia scoparia controlled by Prowl in cotton.

CHEMICAL & FORMULATION:  Active Ingredient: N-(1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzeneamine-43.8% EC (4 lb ai/gal)
200.0 Introduction:

200.1 Uses:
See attached use sheet.

200.2 Background:
The American Cyanamid Company is requesting label revision of Prowl: 1) to extend the period of application from 60 days to 140 days prior to planting cotton, and 2) to add Kochia (Kochia scoparia) to the list of weed species controlled by Prowl in cotton.

Prowl was registered as a pre-plant incorporated for weed control in cotton, corn, and soybeans (EPA Reg. No. 241-263 dated 7/29/75). In cotton, the label permits application of Prowl with ground equipment at up to 60 days prior to planting. Registration of Prowl was amended on 5/24/76 to include: 1) aerial application, 2) delayed soil pre-plant incorporation to within 7 days after application, and 3) pre-plant non-incorporated provided a rain of 1/4 acre inch or more within 7 days after application.

201.0 Data Summary:

201.1 Abstract of Test Reports:
Company summary tables (5) are filed with the EEEB.

201.2 Brief Description of Tests:
Data were from 82 small replicated test trials, 3 of which were from Mississippi, 13 from California, and the remaining 66 trials were from Texas. Prowl was applied and incorporated according to label recommended rates and directions at 17-182 days prior to planting cotton. Standard herbicides employed in comparability testings included treflan, caporal, basalin, tolban and cobex. Only two applications were by air and the remaining were by ground equipment mechanically incorporated.

Test results showed that the herbicidal activities of Prowl were evident in some test plots evaluated at 65-290 days after planting. In all test trials, Prowl's efficacy was equivalent to or better than reference herbicides. Weed species showing acceptable control that were present at the time evaluation were: Pigweed (redroot), Lambs quarter, Barnyardgrass, Fall panicum, Goosegrass, Johnsongrass seedlings, Texas panicum, volunteer sorghum as well as the newly claimed Kochia. It should be noted, however, that Fall panicum, Texas panicum, and volunteer are not among the list of weed species on the Prowl Label. No phytotoxicity or yield data were submitted.

202.0 Conclusions:
202.1 Claims Supported by the Data Submitted:
Data submitted support use of Prowl for the control of Kochia in cotton.

202.2 Claims Not Supported by the Data Submitted:
Because of the inherent variation in cultural practices, climatic conditions, and edaphic factors among the cotton growing states, it was felt that data submitted do not represent the geographic localities of the cotton belt in Eastern U.S. Therefore, extended application of Prowl to 140 days prior to planting must be denied at this time until additional data are submitted justifying the herbicidal selectivity of Prowl for weed control in cotton through out the Cotton belt.

202.3 Additional Data Required to Support Claims and Achieve Amended Registration:
To support extended application of Prowl in cotton from 60 to 140 days prior to application, additional efficacy data must be submitted to support this claim. Data must represent adequate geographic coverage, cultural practices, climatic conditions and edaphic factors of the cotton growing states such as Arizona and Eastern U.S. In addition, label must be specific as to the optimum time of application under a given set of environmental conditions (soils, rain, temperature range), preceding crops (cover crops), cultural practices, or any other recommendations deemed necessary for such extended period of applications.

203.0 Recommendations:
Adding Kochia to the list of weed species controlled by Prowl in cotton is acceptable. Extending the period of application from 60 to 140 days before planting is unacceptable pending submitting additional data as requested under the preceding section (202.3).

Sami Malak -- November 26, 1976
Herbicide Efficacy Section
Efficacy & Ecological Effects Branch