Prowl

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The Ecological Effects Branch requires a chronic aquatic invertebrate study  
and a field monitoring study prior to its completion of an incremental risk  
assessment for the use of Prowl on tobacco. These requirements may be con-  
sidered as conditional requirements of the tobacco registration, meaning that  
the Ecological Effects Branch concurs with the conditional registration of  
Prowl on tobacco where the registrant agrees to complete the above studies  
within a specified time period.

The Ecological Effects Branch requires a chronic aquatic invertebrate study,  
a field monitoring study, a chronic estuarine invertebrate study and a chronic  
estuarine vertebrate study prior to its completion of an incremental risk assess-  
ment for the use of Prowl on sorghum. These requirements must be met before EEB  
can consider a conditional registration of Prowl on sorghum.

The Ecological Effects Branch requires a field monitoring study under FIFRA Section  
3(c)(2)(B) to support the currently registered uses of Prowl (corn, soybeans and  
cotton).

It is the understanding of EEB that the marketing of Prowl for use on tobacco is  
one–two years away. Therefore, considering the time involved in completing a  
chronic aquatic invertebrate study and a field monitoring study, the Ecological  
Effects Branch recommends that the registrant complete and submit the requested  
studies prior to the full scale marketing of Prowl for use on tobacco. Addition-  
ally, the Ecological Effects Branch recommends that, as a part of the condi-  
tional registration, the registrant agrees to discontinue or stop the marketing  
of Prowl for use on tobacco if, after the requested studies are submitted and EEB  
completes its risk assessment, it is determined that this use is an unreasonable  
hazard to fish and wildlife.

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