MEMORANDUM

SUBJECT: PP#5F3271 (RCB#1802). Permethrin on Plums and Cherries. Amendment of 1/8/87. (No Accession No.).

FROM: Nancy Dodd, Chemist Tolerance Petition Section II Residue Chemistry Branch Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head Tolerance Petition Section II Residue Chemistry Branch Hazard Evaluation Division (TS-769C)

TO: George LaRocca, Product Manager #15 Insecticide-Rodenticide Branch Registration Division (TS-767C)

and

Toxicology Branch Hazard Evaluation Division (TS-769C)

The petitioner, FMC Corporation, has submitted an amendment dated 1/8/87 in response to a deficiency contained in RCB's 6/26/86 review of PP#5F3271. The amendment consists of a revised Section B/label.

That deficiency listed in the 6/26/86 review is given below followed by the petitioner's response and RCB's conclusion:

Deficiency

The petitioner should submit a revised Section B which deletes the proposed use directions for plums.

Petitioner's Response

The petitioner submits Attachment I which contains use directions for cherries only. The petitioner also submits a label for Pounce 3.2 EC into which Attachment I is to be inserted. Plums are thus deleted from the label.
RCR's Conclusion

This deficiency is resolved by submission of the revised Section B/label.

Other Considerations

An International Residue Limit Status sheet is attached to the 6/26/86 review of PP#5F3271. A Codex IRL has been proposed for permethrin on stone fruit at 2 mg/kg. No Canadian or Mexican tolerances have been established for permethrin on cherries.

The Codex tolerance expression includes parent only. The U.S. tolerance expression includes parent and its metabolites DCVA and (3-phenoxypyphenyl) methanol.

The Codex proposal is not compatible with the proposed U.S. tolerance on cherries with respect to the tolerance expression and tolerance levels.

Recommendation

If TOX and EAB considerations permit, RCB recommends for establishment of the proposed 3 ppm permethrin tolerance on cherries.

cc: RF, Circu., Reviewer-N.Dodd, EAB, EEB, FDA, PP#5F3271, PMSD/ISB-Eldredge