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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Subject: Cypermethrin Meeting With FMC (2/23/88) to Consider the  
Registration of Improved Isomers to Replace  
the Present Product.

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FMC personnel presented their improved isomer data and claimed a precedent for "bridge" registration of their minus isomer because of the Agency's 1987 registration of ASANA®, an improved fenvalerate isomer.

In 1986, EAB required additional environmental chemistry data for registering ASANA® as follows:

- Aerobic soil metabolism
- Anaerobic soil metabolism
- Field dissipation
- Crop rotation accumulation

FMC must submit the additional data, above, for the minus isomers. If the data show that the minus cypermethrin isomers are not significantly different from the present product, the cypermethrin isomers may be registered using the present cypermethrin data base.

It is interesting to note that RD registered ASANA® and did not require the additional environmental chemistry data requested by EAB in 1986. Will the minus cypermethrin isomer be registered without additional environmental chemistry data? The Toxicology Peer Review committee classified cypermethrin as a class "C" oncogen.

cc: Enil Regelman

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