EEB REVIEW

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TYPE PRODUCT(S): I, D, H, F, N, R, S Synthetic pyrethroid

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. G. LaRocca (15)

PRODUCT NAME(S) Cypermethrin products

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE Progress report on fish full-life cycle study

SHAUGHNESSEY NO.

CHEMICAL, & FORMULATION % A.I.
MEMORANDUM

SUBJECT: Comments by EEB on Progress Reports for the Cypermethrin Fish Full Life Cycle Study Submitted by ICI Americas, Inc.

TO: George La Rocca, PM-15
Insecticides-Rodenticides Branch
Regstration Division, TS-767c

FROM: Ann Stavola, Aquatic Biologist
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

THRU: Douglas Urban, Head--Section 3
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

THRU: Harry Craven, Acting Branch Chief
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

This memo pertains to the three progress reports dated January 12, 1987, November 25, 1987 and February 23, 1988. The progress reports simply present brief descriptions of the stages of the study completed by the dates of the reports and pertinent preliminary statistical analyses.

EEB cannot comment on the scientific validity of these results as the information provided is not sufficient for us to analyze their results. The January 1987 report states that the survival of hatched fry was relatively lower in one of the solvent control replicates. They stated that this replicate will be excluded from the statistical analysis as they could not explain the low rate of survival. It is imperative that the registrant be reminded that EEB will determine if the data should be used in the statistical analysis and that no data should be omitted from the final report. All raw data must be submitted so that EEB can thoroughly analyze the study.