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WASHINGTON, D.C. 20460

R.F.
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. No. 359-685. Iprodione. Request to amend label to include statement authorizing feeding of by-products from processing of treated fruit. Accession No. 252558.

FROM: Lynn M. Bradley, Chemist
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THRU: Charles L. Trichilo, Chief
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TO: Henry Jacoby, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767)

Rhone-Poulenc Inc., Agrochemical Division, has requested authorization to amend the label for its fungicide product, Rovral[®], to include the following statement: "By-products from commercial canning, freezing and drying operations may be fed to meat and milk producing animals." Rovral[®] is a wettable powder formulation containing 50% iprodione [3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide].

Tolerances are established for residues of iprodione, its isomer 3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide, and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide as follows (40 CFR 180.399):

| | | | |
|------------|--------|----------------|----------|
| apricots | 20 ppm | kiwi fruit | 10 ppm |
| cherries | 20 ppm | almonds, meat | 0.05 ppm |
| nectarines | 20 ppm | almonds, hulls | 0.25 ppm |
| peaches | 20 ppm | | |
| plums | 20 ppm | | |
| prunes | 20 ppm | | |

Tolerances are established for residues of iprodione and its non-hydroxylated metabolites (expressed as iprodione equivalents) in meat, fat, and meat by-products of cattle, goats, hogs, horses, and sheep at 0.1 ppm, and for residues of iprodione and its non-hydroxylated and hydroxylated metabolites (expressed as iprodione equivalents) in milk at 0.02 ppm.

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Iprodione is registered for pre-harvest use on stone fruit at 0.125-0.25 lb a.i./100 gal as full coverage spray, or 0.5-1.0 lb a.i./A. Aerial applications may be made during the bloom period only in a minimum of 15 gal/A. No more than 5 applications of iprodione may be made per season, at early bloom, full bloom, petal fall, and twice more during the 5 week period prior to harvest. No preharvest interval is required.

Rhone-Poulenc has submitted information in support of the requested label amendment, explaining how the processing operations generate by-products which might be used for feed, complete with estimates of what residue levels might be in the products being fed. We believe that these by-products represent ill-defined commodities which will be highly variable, depending on the daily operations of the plant and other factors such as the condition of the r.a.c.s when received.

Historically, RCB has not issued food additive tolerances (FATs) for these by-products. We have always been aware that minor amounts of by-products from virtually all processing operations are being used as animal feeds; we have considered most such feeds to be minor items of minimal significance. RCB plans to initiate an investigation to determine the appropriateness of regulating the recycling of these waste materials after the r.a.c. has entered commerce (i.e., upon sale to the processor) in the next fiscal year if such a project is approved.

Furthermore, we consider that the requested label amendment to be impractical. All iprodione treatments are pre-harvest, and the additional statement is clearly intended for the processor, who will not see the label after the fruit has been sold by the grower.

CONCLUSIONS AND RECOMMENDATIONS

We are looking at the use of various processing by-products as animal feeds, but have reached no conclusions on how to regulate residues in animal tissues which may occur from this use of waste products from the processing of r.a.c.s. If Rhone-Poulenc desires to pursue the issue, we would be willing to discuss with them what types of residue data and information on the volume and composition of by-products would be needed to determine whether existing tolerance levels for meat, milk, poultry, and eggs would be adequate.

We are unable to recommend in favor of this amended registration request at this time.

cc: Iprodione S.F., Iprodione Amended Reg., LMB, R.F., circ.,
PP#2F2728
RDI:ARR:6/4/84:RDS:6/4/84.
TS-769:RCB:L. Bradley:edited:wh:6/4/84:CM#2:RM810:X77324