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OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

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Case #: 819456

MEMORANDUM

SUBJECT: CIBA-GEIGY is Requesting a Data Waiver for the Field Accumulation in Rotational Crops (165-2) Study for Metalaxyl

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TO: Walter Waldrop, Product Manager # 71
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Until EFGWB has received and reviewed an acceptable confined accumulation in rotational crops study for metalaxyl, the requirement for the field accumulation in crops study is reserved.

The registrant is requesting a waiver of the field accumulation in rotational crops study (165-2) for metalaxyl. Field accumulation studies in rotational crops are reserved and dependent upon the results of the confined accumulation in rotational crop study (165-1). If significant ¹⁴C pesticide residues of concern to EPA are detected in the test crops analyzed in the confined accumulation study, then field accumulation studies in rotational crops may be required.

Generally, EFGWB does not require or review field accumulation in rotational crop studies until confined rotational

crop studies have been received, reviewed and assessed as having satisfied the data requirements. Since the confined rotational crop study does not now satisfy the data requirements, EFGWB does not have the data to support the request to waive the data requirements for the field accumulation in rotational crops study (165-2) for metalaxyl.