Shaughnessy No.: 122804
Date Out of EAB: JAN 02 1986

To: G. LaRocca
   Product Manager 15
   Registration Division (TS-767)

From: Samuel M. Creeger, Chief
       Review Section #1
       Exposure Assessment Branch
       Hazard Evaluation Division (TS-769)

Attached, please find the EAB review of...

Reg./File #: 50658-EUP-E
Chemical Name: Avermectin
Type Product: Insecticide
Product Name: ________
Company Name: Merck
Purpose: EUP for use on cotton

Date Received: 11/26/85
Date Completed: JAN 02 1986
Action Code(s): 710
EAB # (s): 6160
days: 0.25

Deferrals to: ______ Ecological Effects Branch
             ______ Residue Chemistry Branch
             ______ Toxicology Branch

Monitoring study requested by EAB: [ ]
Monitoring study voluntarily conducted by registrant: [ ]
1. a  CHEMICAL:

Avermectin B₁a
Abamectin.

Chemical structure:

R in B₁ = Ethyl
R in B₂ = Methyl
B₁a and B₁b are geometric isomers

The active ingredient is composed of not less than 80% avermectin B₁a
and not more than 20% avermectin B₁b.

1. b  Physical Properties:

See earlier reports.

2.  TEST MATERIAL: Not Applicable.

3.  STUDY/ACTION TYPE:

EUP for use on cotton.

4.  STUDY IDENTIFICATION: Not Applicable.

5.  REVIEWED BY:

Akiva D. Abramovitch, Ph.D.
Chemist
Environmental Chemistry Review Section 1/EAB/HED/OPP

6.  APPROVED BY:

Samuel M. Creeger, Chief
Supervisory Chemist
Environmental Chemistry Review Section 1/EAB/HED/OPP

7.  CONCLUSIONS: N/A, see section 8.
8. **RECOMMENDATIONS:**

All the environmental fate data requirements for this EUP have been fulfilled (see recent EAB reviews of 8/28/85, 9/9/85, 9/10/85 and 11/4/85 with regard for use as a Fire Ant Insecticide AFFIRM").

However, for the purpose of this cotton EUP, a field dissipation study on cotton is not required but will be required for registration.

We do not see the need to test the product on 5000 acres. For EAB purposes, an EUP of such magnitude is not necessary and less than 100 acres would be adequate to gather the field dissipation data needed to support registration on cotton.

9. **BACKGROUND:**

A. **Introduction:** Merck satisfied all the data requirements for registration of Abamectin for use in AFFIRM as a Fire Ant Insecticide. The present submission is for an EUP on cotton. The request is for spraying 187.5 pounds of Abamectin on 4000 acres in 14 states (0.02 lb/acre/application).

B. **Directions for Use:** Please see attached copy of the proposed label. Each gallon contains 0.15 pounds of the active ingredient abamectin (2%). The proposed use is for 0.02 pounds per acre (per application?) for a maximum of three applications per year.

10. **DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:** No new data submitted—see recommendation in section 8, above.

11. **COMPLETION OF ONE LINER:**

A one-liner has not been initiated.

12. **CBI APPENDIX:**

None.
Page ____ is not included in this copy.
Pages 4 through 7 are not included in this copy.

The material not included contains the following type of information:

__ Identity of product inert ingredients
__ Identity of product impurities
__ Description of the product manufacturing process
__ Description of product quality control procedures
__ Identity of the source of product ingredients
__ Sales or other commercial/financial information
   X A draft product label
__ The product confidential statement of formula
__ Information about a pending registration action
__ PIFRA registration data
__ The document is a duplicate of page(s) _______
__ The document is not responsive to the request

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.