MEMORANDUM

SUBJECT: Fenoxycarb: Preparation for Cancer Peer Review

FROM: Marion Copley, DVM, Section Head
Section 4, Tox. Br. 1
Health Effects Division (H7509C)

SACB
Health Effects Division (H7509C)

Tox. Chem.#: 652K

CONCLUSIONS:

The data package required to present fenoxycarb to the Cancer Peer Review Committee is incomplete (see discussion).

DISCUSSION:

At the time fenoxycarb was scheduled TB1 had been told that all outstanding data would be in the Agency by March 1992. Part of the problem has been that this chemical has been purchased from MAAG by Ciba-Giegy. As can be seen by the attached memorandum (dated 9/24/91) and ROC (dated 10/31/91) the Registrant is aware of the deficiencies and had expressed intent to submit the required information. As of today, this information has not been received in TB1. The RD review manager is currently checking on the status of the Registrant's response. TB1 will notify you as soon as the needed data has been received. We are sorry for any inconvenience that this has produced.
MEMORANDUM

SUBJECT: Fenoxy carb: Record of call: 10/28/91

FROM: Marion Copley, DVM, Section Head
Section 4, Tox. Br. 1
Health Effects Division (H7509C)

TO: HED files

Tox. Chem. #: 652A

Jim Stevens of Ciba-Giegy called concerning Fenoxy carb. He said that Ciba had purchased Fenoxy carb from MAAG. He had been told by someone that a Peer Review was scheduled in December. He also said that they were anticipating submitting responses to all deficiencies in the first quarter 1992. The mouse slides (lung and Harderian gland) and rat slides (pituitary) were being reevaluated by Jerry Hardesty. These studies had originally been conducted by Hazelton.

I told him that I did not know who his source was but a Peer Review is not scheduled for December. I also informed him that Tox, Br1 has requested that RD obtain additional data from the registrant (see memorandum from Greear to Tavano/Hutton dated 9/24/91) concerning the above studies. Evaluation of this information is essential prior to conducting the Peer Review of Fenoxy carb.

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CC: Tavano
    Hutton
    Greear
MEMORANDUM

SUBJECT: Fenoxycarb - Additional Data Needed for the Peer Review of its Potential Carcinogenicity

PC No.: 125301
TOX Chem No.: 652E

FROM: William B. Greear, M.P.H. Review Section IV, Toxicology Branch I Health Effects Division (H7509C) 9/23/91

TO: Joseph Tavano/Phil Hutton, PM Team #17 Insecticide-Rodenticide Branch Registration Division (H7505C) Marion P. Copley, D.V.M., Section Head Review Section IV, Toxicology Branch I Health Effects Division (H7509C)

THRU: 9/23/91

In preparation for a Peer Review meeting to evaluate the carcinogenic potential of fenoxycarb, several additional questions (and recommendations) arose upon consultation with HED's pathologist. These need to be resolved as soon as possible. The items are discussed below, study by study:

1. 80 Week Carcinogenicity/Toxicity Study in Mice, Research Report No. B-104 819, MRID Nos. 40376902 and 40972701, March 1987

   1. The sponsor should respond to the question: Why was it deemed necessary to make serial sections of the Hard rian gland?

2. Fenoxycarb (Ro13-5223/000): 104-Week Oral (Dietary Administration) Carcinogenicity and Toxicity Study in the Rat With a 52-Week Interim Kill. Hazleton Report No. 5191-161/123, MRID No. 40376901, November 1986

   1. TB-I wishes to reiterate the deficiencies noted in the DER of this study and recommends that the sponsor correct them where possible.
"The study suffers from several deficiencies. May of the parameters that were measured were not statistically analyzed. Examples of this are no statistical analysis of body weight, food consumption, hematology values and the results of the histopathology examination. In the clinical chemistry examination, no determinations were made for SGOT, SGPT, and alkaline phosphatase for rats in the 200 and 600 ppm groups at 25, 51, and 78 weeks even though positive results were obtained for the 1800 ppm group. Tissue accountability tables are absent, therefore, it is impossible to determine how many animals had a complete set of tissues examined. It is unknown how many sets of tissues (or partial sets) were lost to autolysis, cannibalism, etc. Most important, it is impossible to determine the actual percent incidence of lesions within groups of animals. Also conspicuously missing from the individual pathology sheets is the date of death of the animal which would be of use in analyzing the data. The sponsor should provide information on the time-weighted average daily intake of the test material. Historical control data are required for the pituitary tumors as noted above. This should present the data by study for 2+ years on either side of this present study. The data should be from the same laboratory, using the same strain of rat and be for the same duration. The tumors should be listed for the malignant tumors, benign tumors and pituitary tumor bearing animals (sexes separate)."

2. TB-I has recently consulted with HED's pathologist who indicated that the incidence of pituitary carcinoma observed in the study are unusually high. It is suggested that the sponsor reexamine the slides of the pituitary gland in light of this unusually high finding. It is also recommended that the sponsor provide the criteria used in classifying the pituitary proliferative lesions. In addition, the submission of photomicrographs of these lesions would greatly assist in our evaluation.
March 14, 1995

MEMORANDUM

SUBJECT: Carcinogenicity Peer Review Meeting on FENOXYCARB

FROM: Esther Rinde, Ph.D. E.R.
Manager, Carcinogenicity Peer Review
Health Effects Division (7509c)

TO: Addressees

Attached for your review is a package on Fenoxycarb prepared by Mr. William Greear.

A meeting to consider the carcinogenicity classification of this chemical is scheduled for Wednesday May 10, 1995, at 10:00 am in Room 817, CM2.

Addressees

S. Irene
W. Burnam
K. Baetcke
M. Van Gemert
K. Dearfield
H. Pettigrew
B. Fisher
L. Brunsman
E. Doyle
M. Copley
W. Greear
R. Hill
Y. Woo
A. Aranda
R. Ross/L. Brenneck