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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

APR 18 1989

MEMORANDUM

SUBJECT: Review of Mesocosm Study on Karate (lambda-cyhalothrin)
FROM: *James W. Akerman*
James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H-7507-C)
TO: George La Rocca, Product Manager (15)
Insecticide and Rodenticide Branch
Registration Division (H-7505-C)

The Ecological Effects Branch (EEB) has completed the review of the mesocosm study that was conducted on Karate (also known as PP321, and lambda-cyhalothrin).

The study has been classified as supplemental, and may be upgraded to core, pending the registrants response to the questions raised in the review.

The concerns were mentioned in section 14. A., B., C., and D., of the data evaluation record. Specifically, EEB has identified the following data discrepancies that need to be addressed before the study can be reclassified:

- 1- Residue monitoring was not carried out as stated in the protocol or as stated in the summary of the sampling program (see section 14. A. (4) of the review).
- 2- The smallest size of bluegills that were stocked is inconsistent between the report summary and the submitted data (see section 14.A.(6) of the review).
- 3- The number of adult fish varies considerably within replicates (see section 14.A.(7) of the review) and is inconsistent with the reported stocking density.
- 4- There were data discrepancies within the raw data presented in ICI tables 127 and 128 (see section 14.A.(10) of the review).
- 5- Recorded data for 3 cm, 5 B replicate should be submitted for both weight and numbers of fish (see section 14.A.(11)).

6- There appears to be a recording error for replicate 7B with regards to the hydrosoil residue (see section 14.A.(12) of the review).

EEB will be awaiting the response from ICI Americas, Inc. in writing before committing to a company meeting. If you have any further questions, please feel free to contact Candy Brassard, (703) 557-0019.