

US EPA ARCHIVE DOCUMENT

DP Barcode : D198986
 PC Code No : 129011
 EEB Out : / /

7/13/94

To: Cynthia Giles-Parker
 Product Manager 22
 Registration Division (7505C)

From: Anthony F. Maciorowski, Chief
 Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 000707-EGR
 Chemical Name : Fenbuconazole
 Type Product : fungicide
 Product Name : Indar
 Company Name : Rohm & Haas
 Purpose : Review attached Ecological Risk Assessment.

Action Code: 101
 Reviewer: Regina Hirsch

Date Due: 6/3/94

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur
 P=Partial (Study partially fulfilled Guideline but additional information is needed)
 S=Supplemental (Study provided useful information but Guideline was not satisfied)
 N=Unacceptable (Study was rejected)/Nonconcur



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Fenbuconazole-Ecological Risk Assessment from Rohm & Haas

TO: Cynthia Giles-Parker
Product Manager 22
Registration Division (7505C)

FROM: *for* Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (7507C)

Douglas J. White
7/13/94

The Ecological Effects Branch has reviewed the ecological risk assessment on Fenbuconazole submitted by Rohm and Haas (DP Barcode D198986) in comparison to EEB's Registration Standard (DP Barcode D1710101, D171018, D166369, & D166375).

EEB finds the arguments presented by Rohm and Haas regarding the need for fish life cycle testing and risk to avian endangered species to be non-persuasive. Nonetheless, EEB concurs with R&H's request that the fish-life cycle test not be prerequisite to registration if Rohm and Haas submits the data within a year of issuance of a conditional registration and in the meantime identify additional (other than the 75 foot set-back, such as limiting repeat applications) mitigation measures which would further reduce the chance of Fenbuconazole entering aquatic systems.

Second, the Section 7 Consultation for endangered species identified in the Registration Standard may be dismissed if prudent mitigation measures are recommended that would reduce risks to avian and aquatic endangered species below the Level of Concern (LOC) identified by EEB in their Registration Standard. These mitigation measures may entail lowering application rates, limiting repeat applications, eliminating aerial applications, etc.

If you have any questions on the above, please contact Regina Hirsch (305-5366).



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