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PESTICIDE IMPA
IR-4 PROGRAM
DEPARTMENT C
DAVIS, CALIFOR

February 20, 1996

TO: Chairs, Department of Botany - UCB, UCD, UCR
Chairs, Department of Entomology - UCB, UCD, UCR
Chairs, Department of Plant Pathology - UCB, UCD, UCR
County Agricultural Commissioners
County Directors
Commodity Groups

FROM: Rick Melnicoe *Rick Melnicoe*
Regional Coordinator
Western Region IR-4/PIAP

RE: Reregistration Notification Network

This issue of the RNN notes that EPA has decided on the position it will take concerning the 1992 Delaney-related petition submitted by the National Food Processors and others. In the near future they are expected to decide how this decision will affect current tolerances and registrations. We'll report on those decisions as soon as they are made public.

A recent publication that may be of interest is titled "Modernize our Food Safety Laws: Delete the Delaney Clause". This 24-page booklet is available from the American Council on Science and Health for \$3.85 at:

American Council on Science and Health
1995 Broadway, 2nd Floor
New York, New York 10023-5860
Phone: 212-362-7044
Fax: 212-362-4919

PESTICIDE COORDINATION POLICY

The USEPA has issued a notice to explain and reaffirm its long-held policy, the pesticide coordination policy, of coordinating food safety regulations under FFDCA with pesticide registration under FIFRA. This significantly impacts implementation of the Delaney clause. This decision completes the USEPA's response to the 1992 Delaney-related petition by the National Food Processors and others which asked,

Karen-
Please see Copies
gto: Richard
Cam
Kurt
Michael
Harvey *Mike* *June*

in part, that the USEPA's policy of linking processed and raw food pesticide tolerances be discontinued. In place since 1963, the coordination policy is designed to ensure that the lawful use of pesticides by farmers will not result in unlawful residues in processed food or feed. As a consequence of this policy and the Delaney clause, some pesticide tolerances are expected to be revoked and the pesticide registrations on which they are based are expected to be canceled. Last year, EPA conducted an economic impact assessment as to potential impacts on agricultural producers as a result of continuation of this policy without change. The assessment concluded that the total economic impact on affected producers could be as high as \$500 million. Only three crops were estimated to incur impacts greater than 5 percent of their annual 1989-91 U.S. production value (PINEAPPLE 29%, SUGARCANE 13%, and GRAPES 5.1%). Absolute projected impacts were highest for SUGARCANE, GRAPES, POTATOES, RICE, and APPLES, which together comprised about 70% of total impacts projected. For various reasons, however, the assessment was based on a worst-case scenario and actual impacts are expected by EPA to be far less. EPA will update its economic impact analysis when it evaluates remaining uses potentially affected by the Delaney clause.

For additional information contact:

Ms. Jean M. Frane, EPA, Policy and Special Projects
Phone: 703-305-5944, Fax: 703-305-6244
frane.jean@epamail.epa.gov

STATUS OF DRIED COMMODITIES AS RAW AGRICULTURAL COMMODITIES

The USEPA has issued a notice to explain its interpretation of the term "raw agricultural commodity (RAC)" as applied to dried agricultural commodities under FFDCA. This notice on the RAC policy is prompted indirectly by the Delaney clause which prohibits the establishment or maintenance of tolerances for a cancer causing pesticide in processed food, but does not prohibit such tolerances in raw food. Therefore, the classification of a commodity as a RAC or processed food is important. The USEPA's interpretation of RACs as applied to dried commodities is based primarily on the purpose of drying rather than the means or degree of drying. Commodities which routinely are dried for the purpose of storage or transportation are to be considered RACs and those dried to create a new product are to be considered processed, thus, hay, grain, and nuts would be treated as raw food, whereas dried fruits such as raisins would be treated as processed food. This interpretation will not change the current classification of any dried commodities.

For additional information contact:

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The Captan Task Force has petitioned the USEPA requesting the revocation of the food additive regulation for captan residues in or on washed RAISINS. They feel that a processing study they submitted shows that captan residues do not concentrate in raisins above the level of the 408 tolerances for captan on grapes. There is no registered postharvest use of captan. The USEPA is asking for comments from the public. Copies of the petition can be obtained from the Public Response Branch of EPA. Written comments, identified by PF-645, should be sent to the Public Response Branch of EPA by 3/1/96.

For information contact:

Ms. Niloufar Nazmi

EPA, Special Review Branch

Phone: 703-308-8028

Fax: 703-308-8041

nazmi.niloufar@epamail.epa.gov

Copies and written comments:

Public Response Branch (7506C)

EPA, Office of Pesticide Prog.

401 M Street, SW

Washington, DC 20460

opp-docket@epamail.epa.gov

During reregistration, the Cryolite Task Force plans to defend certain uses of cryolite, support others in cooperation with IR-4, and leave some uses unsupported. The unsupported uses are being dropped primarily because the cost of reregistration exceeds expected returns. The primary registrants may consider maintaining some of these unsupported uses if another party is willing to develop the necessary data. The final RED (reregistration eligibility document) is expected from the USEPA in May of 1996.

SUPPORTED USES EXPECTED TO BE REREGISTERED:

Supported by registrants: APRICOTS, BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER, CITRUS, CUCUMBERS, EGGPLANT, GRAPES, KIWIFRUIT, KOHLRABI, LETTUCE, MELONS, NECTARINES, PEACHES, PEARS, PEPPERS, PLUMS, POTATOES, PUMPKINS, SQUASHES, and TOMATOES

Supported by IR-4: BLACKBERRIES, BLUEBERRIES, BOYSENBERRIES, CRANBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES, STRAWBERRIES, and YOUNGBERRIES

UNSUPPORTED USES LIKELY TO BE CANCELED: APPLES, BEANS, COLLARDS, MUSTARD, RADISHES, and TURNIPS

For additional information contact IR-4 (addresses below) or:

Ms. Elizabeth Codrea - or -

Gowan Company

Phone: 602-783-8844

Fax: 602-343-9255

Mr. Chris Davis

ELF Atochem North America, Inc.

Phone: 215-419-7147

Fax: 215-419-7243

Ciba Crop Protection has reached a decision about which registered uses of diazinon it will defend during reregistration, those to be supported in cooperation with IR-4, and those left unsupported. Some uses of this insecticide cannot be maintained because of dietary concerns, such as livestock-related uses and infant foods. However, other uses remain unsupported because the cost of reregistration does not justify continued registration. The following unsupported uses will be removed from labels by 8/31/96, after which products with these unsupported uses may not be sold or distributed, although use of products as labeled may continue. Ciba may consider maintaining some of these unsupported uses if another party is willing to develop the necessary data. EPA's RED on diazinon is expected to be available in 1997.

SUPPORTED USES EXPECTED TO BE REREGISTERED:

Supported by Ciba: ALMONDS (CA), ANIMAL QUARTERS (except DAIRY BARNS, MILK ROOMS & POULTRY HOUSES), APPLES, APRICOTS, BANANAS (import tolerance - no label in U.S.), BARNS (except DAIRY BARNS, MILK ROOMS & POULTRY HOUSES), BARRIER STRIPS, BEANS (succulent LIMA, POLE, and SNAP, including seed trmt), BEETS(RED), BLACKBERRIES (WA, OR & CA), BOYSENBERRIES (WA, OR & CA), BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CANTALOUPE, CARROTS, CASABAS, CAULIFLOWER, CELERY, CHERRIES, CHINESE BROCCOLI, CHINESE CABBAGE, CHINESE MUSTARD, CHINESE RADISH (CA & FL), COLLARDS, CORN(FIELD) (seed trmt), CRENSHAW, CUCUMBERS, DEWBERRIES (WA, OR & CA), DITCH BANKS, ENDIVE, FOOD HANDLING ESTABLISHMENTS, GINSENG, GRAPES, HONEYDEW MELONS, HOPS, KIWIFRUIT (import tolerance - no label in U.S.), LETTUCE, LOGANBERRIES (WA, OR & CA), MUSKMELONS, MUSTARD, NECTARINES, ONIONS(GREEN & BULB), ORNAMENTALS, PARSLEY, PARSNIPS, PEACHES, PEARS, PEAS (succulent including seed trmt), PEPPERS, PINEAPPLES, PLUMS, POTATOES, PRUNES, RADISHES, RASPBERRIES (WA, OR & CA), ROADSIDES, RUTABAGA, SHEEP, SPINACH, SQUASH(SUMMER), SQUASH(WINTER), STRAWBERRIES, SUGARBEETS, SWEET CORN, SWEET POTATOES, SWISS CHARD, TOMATOES, TURF (other than golf courses and sod farms), TURNIPS, WALNUTS (CA), and WATERMELONS

Supported by IR-4: BLUEBERRIES, CRANBERRIES, FIGS (no label yet), FILBERTS (no label yet), MUSHROOM HOUSES, and WATERCRESS (24c in HI)

UNSUPPORTED USES LIKELY TO BE CANCELED: ALFALFA, BANANAS, BEANS(dried), BERMUDAGRASS, CITRUS FRUITS, CLOVER, CORN(FIELD) (except seed trmt), COTTON, COWPEAS, GRASS FORAGE, GUAR, LESPEDEZA, OLIVES, PASTURES, PEANUTS, PEAS(dried), PECANS, RANGELAND, SORGHUM, SOYBEANS, TREFOIL, and TOBACCO

For assistance in defending unsupported food or ornamental crop uses of cryolite or diazinon, please contact the Western Region IR-4 office.

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For additional information contact:

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Fax: 910-292-6374
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Western Region IR-4/PIAP
Dept. of Environmental Toxicology
University of California
Davis, CA 95616-8588
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The USEPA has revoked the food additive regulation (FAR) for residues of the herbicide trifluralin in peppermint oil and spearmint oil as of 1/26/96. EPA is taking this action because these are no longer viewed as ready-to-eat commodities, and residues of trifluralin are not likely to concentrate in ready-to-eat foods containing them. Therefore, this FAR is not necessary. This action will not affect the use of trifluralin on mint. The proposal for this revocation was published here on 8/9/95. Comments, with mention of OPP-300394A, should be sent to the Public Response Branch of EPA by 3/11/96.

For information contact:

Ms. Niloufar Nazmi
EPA, Special Review Branch
Phone: 703-308-8028
Fax: 703-308-8041
nazmi.niloufar@epamail.epa.gov

Send written comments to:

Public Response Branch (7506C)
EPA, Office of Pesticide Prog.
401 M Street, SW
Washington, DC 20460
opp-docket@epamail.epa.gov

The Reregistration Notification Network is a cooperative effort of USDA-NAPIAP, Interregional Project No. 4 (IR-4), U.S. Environmental Protection Agency (USEPA), and the American Crop Protection Association (ACPA).

If you have any questions, please contact me or Margaret Reiff at (916) 752-7633.

RM

cc Director, CPMRE
Michael Stimmann
Margaret Reiff

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Valerie Brown, CDFA
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