

The R.E.D. Zone

A Look at the Re-registration Eligibility Document

Before you read this article, answer these questions: Is chlorothalonil (Daconil®, Manicure®, Echo®, Docket®) important to your pest management regime? How about iprodione (26GT®, 18 Plus®)? Vinclozolin (Curalan®, Touché®)? Take your time now.

Your answers were probably, "Yeah, I use these, but what's the point?" or "Yes they are very important to me." Or perhaps you answered, "Yes, oh crap, that reminds me, I have to order more because I'm going to be spraying for snow mold soon."

Now answer this. How would your pest management regime be affected if these three active ingredients were to be taken away, never to be available again? What if they were gone? I would bet at least one of these active ingredients is important to you and how you control disease. I also think that not having them would affect your regime immensely.

A few years back, there were concerns with the use of chlorothalonil on turfgrass. There were questions about it being banned altogether. Chlorothalonil is one of the oldest fungicides around; it dates back to 1966. Given its long history, one wondered why the EPA would eliminate it. Why would they get rid of something so prevalent in the industry for disease control? Well, chlorothalonil is still around, and most of us have forgotten that there was ever a concern about losing this chemistry for good. But what happened then that changed the way we use chlorothalonil and other pesticides forever?

In 1988, the Federal Insecticide, Fungicide and Roenticide Act (FIFRA) was amended by the Environmental Protection Agency (EPA) to require review of the environmental and health affects of older, registered pesticides. In 1996, FIFRA was further amended by the Food Quality Protection Act (FQPA) to require all pesticides to meet new safety standards. This changed the way pesticides are evaluated in

relation to their health effects on infants, children, and other sensitive individuals. Under the act, a Re-registration Eligibility Document (R.E.D.) must be completed for every pesticide registered before November, 1984. It is up to patent holders to research and pay for the R.E.D. process, which can take years and millions of dollars to complete.

In the case of chlorothalonil, the R.E.D., which was completed in 1998, is a 337 page document. It is an extensive review of all the studies run by the product's patent holders. The document describes the product's effects on human health and the environment. Based on the R.E.D. findings, chlorothalonil is now restricted for use on home lawns. For golf course turf there is a cap on the total amount of product that can be used on an annual basis. Each treated area is different. For example, greens are 73 lb. ai/A per year, tees are 52 lb. ai/A per year, and fairways are 26 lb. ai/A per year. The cap further restricts use to a maximum of 7.3 lb. ai/acre per application. The minimum spray interval is seven days for 7.3 lb. ai/acre and 14 days for 11.3 lb. ai/acre. The total product application must fit beneath the seasonal cap. These

are the EPA's conclusions on the use of chlorothalonil on turf. The end result is not that detrimental. It could have been a lot worse, right?

Pesticides containing iprodione and vinclozolin were also on the EPA's chopping block. These chemistries underwent the same review process as chlorothalonil and have also been restricted.

Iprodione was first introduced in 1979 as a fungicide. Since then 21 iprodione products have been registered.



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The EPA issued a R.E.D. for iprodione on September 30, 1998.

For vinclozolin, on the other hand, a few more steps had to be taken to get the R.E.D. issued. The fungicide vinclozolin was introduced in 1981. A Data Call-In (DCI) or a "pesticide audit" was ordered in 1991. It required the patent holders to submit additional data on their product's residue chemistry, toxicity, environmental fate, and ecological effects. DCIs were also ordered in 1995 and 1996. These called for additional environmental, ecological, and post application information. With this added information, vinclozolin was finally ready for the R.E.D. process. On September 29, 2000, the EPA completed the R.E.D. for the use of vinclozolin on turf.

My point is that even though these chemistries have been around for years, it doesn't guarantee that they will be around in the future. We have to fight to keep them. In the case of PCNB, the EPA has decided that it is ineligible for re-registration for turf use. Because PCNB did not meet the health and ecological standards, EPA did open a public comment period. They extended the deadline date three times in order to give product users the opportunity to comment on the importance and use of PCNB. Did you comment? Oops. Many of these chemistries are very important to us in the turf industry. Some of us may be unaware that there were times when we could have lost them. There are companies out there doing their best to keep these products around. Some are also inventing new chemistries in case the old ones get the axe.

Like the re-registration process, the evaluation of new chemistries has been greatly affected by the Food Quality Act. The standards for registering a new chemical are similar to the R.E.D. process, but require even more research. The cost of introducing a new chemical is unbelievable. I'll save that topic for another article. **-OC**

This information and additional information is available at the Environmental Protection Agency website, www.epa.gov.

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