## Focus on Fungicides

The following products were not included in July's fungicide report.

| Company | Product | Active ingredients | Formulation | Application rate (oz/1,000 sf) | Application interval (days) | Cost per 1,000 of application | Action | Toxicity (LD-50) | States not registered in | Market area |
|---|---|---|---|---|---|---|---|---|---|---|
| **DowElanco**<br>9002 Purdue Road<br>Indianapolis, Ind. 46268-1189<br>Gary Johnson<br>800-352-67789<br>**Circle #201** | Rubigan | Fenarimol | L | 0.75-1.5 | 10-28 | $1.40-2.82 | C | Oral >2,500 | None | Natl |
| | Broadway | Fenarimol (1) & chlorothalonil (2) | L | 3.0-4.5 | 14-21 | $2.60-3.90 | C & S | Oral >2,500 (1),>10,000 (2) | Calif | Natl |
| **Rohm & Haas Co.**<br>Independence Mall West<br>Philadelphia, Pa. 19105<br>Robert Gordon<br>215-592-3292<br>**Circle #202** | FORE | Mancozeb | P | 6-8 | 7-14 | $1.95 | C | Oral > 11,200, Dermal >15,000 | None | Natl |

**Formulation:** Powder (P), Liquid (L)

**Action:** Contact (C), Systemic (S)

## biosys pact

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personnel at ADM's new bioproducts manufacturing facility in Decatur, Ill., to provide production technology expertise and management of the fermentation and downstream processes.

Palo Alto-based biosys mass produces its beneficial nematodes and insect-killing micro-organisms (that constitute the active ingredient in biosys' biological pesticide products) at ADM. Products that biosys can produce under the new agreement include biopesticides and other industrial fermentation products which are not competitive with ADM's own product lines.

## Great Western saddled with hefty fine

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situation in Oregon. Company President Jon D. Loft has taken personal control of the Great Western office in Albany and a letter detailing the firm's position has been sent to all customers.

The letter states: "It is important that you realize that proprietary varietal seed certification has not been affected. The certification program for varieties like Palmer, Rebel II, Reliant, etc., takes place at the grower level, not at Great Western. The state and the grower work together to achieve certified status.

"We regret that these actions have taken place. The problem had been eliminated eight months prior to the state and the university's findings... We are working to regain our former stature. We hope to continue working with you in the future."

In addition to the fine, the state suspended Great Western's dealer's license for 30 days, a period which ended Sept. 17. The Agriculture Department also placed the business on probation for one year and revoked Great Western's OSU-certified warehouse status for two years.

The letter also addresses the two-year certification loss:

"The loss of certification status means that for two years we will not be able to produce certified mixtures or blends at Great Western.

"Arrangements have been made with approved warehouses to fulfill the needs of customers who require certified seed mixtures from Oregon. Certified mixtures under the interagency certification program are still available from New Jersey, Maryland and Ohio."

## Reregistration

**Continued from page 1**

Scientists at chemical companies have also been asked for their suggestions. The EPA expects to issue a five-chapter, guideline-by-guideline analysis of its required procedures. The first chapter is due out this month, while the remaining four are expected next year.

The purpose of this analysis is fourfold:

- To provide pesticide registrants and laboratories with information on rejection factors to minimize their recurrence.
- To reassess the adequacy of EPA guidance.
- To determine appropriate regulatory response to future rejected studies.
- And to make any internal changes in the process, procedures or criteria deemed appropriate.

As each of the five chapters is completed, it will be mailed to all pesticide registrants — about 600 pesticide-data-producing laboratories — and interested parties in the international arena.

The clear goal of this agency-wide reassessment, according to Heier, is to improve the quality and acceptance rate of reregistration applications. The problems are widespread, he explained.

"These inadequacies are not concentrated in one area," said Heier. "Companies are making mistakes all over the place. When you've got a 30-percent rejection rate, you've got across-the-board problems."

Heier offered a few examples of application shortcomings. Here are the top three rejection factors in the area of residue studies: 1) Laboratory methods inadequately validated or described; 2) Insufficient geographic representation; 3) Lack of data regarding aerial sprinkler application.

Heier explained that once a single study is rejected, the application is also rejected. Of course, that particular study must be reconducted before the application is resubmitted.

"But that's not the worst part," said Heier. "That holds up the entire review process for that chemical. We almost have to start from scratch [when the application is resubmitted]. That's the single biggest factor in why the EPA process is so slow.

"That's why we're reviewing the process. That's why we've called in the industry and asked, 'What's wrong here? Why are we getting such a high rejection rate?' "

While Heier noted that every chemical firm has, at one time, been asked to repeat studies, most of the problems come with smaller companies that don't have the means for in-depth quality control.

He added EPA is concentrating on reregistration rejections, as opposed to new-product registration rejections. Reregistration has clearly been the top priority: Whereas companies request registration on 12 to 15 new products each year, the EPA must address more than 600 reregistration applications by 1997.