Health Canada Santé Canada

Evaluation Report for Category B
Subcategory 3.1, 3.5, 3.6, 3.7, 3.8, 3.10, 3.11, 3.12 Application

Application Number: 2010-1450
Application: Changes to product label: application rate increase, rotational crops/plant back interval, pre-harvest/ slaughter/ with-holding, pre-grazing interval, re-entry interval, tank mixes, new pests, new site or host
Product: Tattoo Fungicide
Registration Number: 29554
Active ingredient (a.i.): Propamocarb hydrochloride
PMRA Document Number English PDF: 2074010

Purpose of Application

The purpose of this application was to amend the label by adding a new claim for control of late blight on potatoes and downy mildew on cucurbits based on the precedent product, Tattoo C (Registration Number 24544).

Chemistry Assessment

A chemistry assessment was not required for this application.

Health Assessment

The use of Tattoo Fungicide on potatoes and cucurbits is equivalent to the use pattern of the precedent product. Exposure to workers mixing, loading and applying Tattoo Fungicide or entering treated areas is not expected to increase relative to the use pattern of the precedent product.

New residue data for propamocarb hydrochloride in potatoes were submitted to support this application. Previously reviewed residue data from field trials conducted in/on potatoes and cucurbits, and processing data in potatoes were assessed in the framework of this application.

Following the review of all available data, the current maximum residue limits (MRLs) of 0.5 ppm for potatoes and 2.5 ppm for cucurbits are considered acceptable. Residues in these crop commodities at the established MRLs will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

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Table 1 Summary of field trial and processing data used to establish maximum residue limits (MRLs)

Commodity	Application Method/ Total Application Rate	PHI (days)	Residues (ppm)		Experimental Processing Factor	Currently Established MRL	Recommended MRL
			Min	Max			
Potatoes	Foliar applications/ 5 kg a.i./ha	14	<0.05	0.06	No quantifiable residues when treated at exaggerated rate.	0.5 ppm	Not applicable, current MRL is adequate

Environmental Assessment

The use of Tattoo Fungicide on potatoes and cucurbits is equivalent to the use pattern of the precedent product. No environmental risk assessment was required as the use of Tattoo Fungicide will not result in higher risk relative to the precedent product. No buffer zones are required; however, drift mitigation measures are required.

Value Assessment

One trial from New York (2000) tested Tattoo Fungicide (1.4 L/ha) tank-mixed with Bravo (1.0 kg a.i./ha), which effectively controlled downy mildew (*Pseudoperonospora cubensis*) on summer squash. The active ingredient application rates recommended for control of downy mildew on cucurbits are identical between the Tattoo Fungicide tank-mix and the precedent product. A tank-mix of Tattoo Fungicide with either Bravo 500 Agricultural Fungicide (Registration Number 15723) or Bravo 720 (Registration Number 29225) is thus expected to similarly control downy mildew on cucurbits.

Results from one potato trial indicated that Tattoo Fungicide applied at 1.4 L/ha showed statistically comparable efficacy to the commercial standard Ridomil Gold, although levels of disease reduction were numerically lower in the Tattoo Fungicide treatment. A second potato trial showed that Tattoo Fungicide at 1.4 L/ha controlled late blight (*Phytophthora infestans*) incidence under low to moderate disease pressure. In two supplemental trials on tomato late blight, Ridomil Gold and Tattoo Fungicide at 1.5 L/ha provided an average of 68% and 65% reduction of disease severity. The weight of evidence is sufficient to conclude that Tattoo Fungicide applied at 1.5 L/ha will adequately control late blight on potatoes.

Tattoo Fungicide at 1.5 L/ha tank-mixed with chlorothalonil- or mancozeb-containing fungicides for control of early and late blight will also offer growers more flexibility by managing two common potato diseases at once.

Conclusion

The PMRA conducted an evaluation of the subject application and concluded that use of Tattoo Fungicide in accordance with the label has value and will not pose unacceptable health or environmental risk.

References

625682 1998, Propamocarb-derived residues in potatoes following five applications of Tattoo C at the maximum proposed rate – USA, 1996, Data Numbering Code: 7.4.1, 7.4.2, 7.4.6

625689 1999, Cabbage: Stability during deep freeze storage up to 38 months (interim report to 25 months), Data Numbering Code: 7.3

625690 1999, Potato tubers: Stability during deep freeze storage up to 26 months, Data Numbering Code: 7.3

625711 1998, Independent laboratory validation of "Analytical method for the determination of residues of propamocarb in potatoes" according to PR notice 96-1 guidelines, Data Numbering Code: 7.2.3, 7.2.5

625723 1999, Uptake of [^{14}C]- propamocarb hydrochloride residues in soil by rotational crops under confined conditions, Data Numbering Code: 7.4.3

625747 1999, At harvest propamocarb hydrochloride derived residues in rotational crops following sequential application of BANOL® to bare soil at the maximum proposed rate and the shortest rotational interval, USA, 1997, Data Numbering Code: 7.4

625749 1999, Tomatoes: Stability during deep freeze storage up to 26 months, Data Numbering Code: 7.3

625754 1996, Propamocarb-derived residues in potatoes and processed potato commodities following application of Tattoo C - USA 1995, Data Numbering Code: 7.4.5

728426 2003, Propamocarb: Analytical method for the determinatio of propamocarb (AE B039744) and its metabolites AE F155306, AE F132679, AE F132675 and propamocarb glucuronide in animal matrices using LC/MS/MS, Data Numbering Code: 7.2.1, 7.2.5

1891397 2010, Tattoo fungicide for control of downy mildew on cucurbits (crop group 9) and late blight on potato, Data Numbering Code: 10.1, 10.2.1, 10.2.2, 10.2.3.1, 10.2.3.3, 10.3.1, 10.3.2

1891399 2010, Tattoo fungicide for control of downy mildew on cucurbits (crop group 9) and late blight on potato, Data Numbering Code: 10.2.3.1,10.2.3.3

1891477 2010, Petition for exemption from additional residue trials when comparing Tattoo® C and Tattoo® fungicide formulations, Data Numbering Code: 7.4.1, 7.4.2, 7.4.6

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