



## Evaluation Report for Category B, Subcategory 3.4 Application

**Application Number:** 2012-1471  
**Application:** Changes to Product Labels-Application Method  
**Product:** Tattoo Fungicide  
**Registration Number:** 29554  
**Active ingredients (a.i.):** Propamocarb Hydrochloride (PHY)  
**PMRA Document Number :** **2297623**

### Background

Tattoo Fungicide is a commercial product containing the active propamocarb hydrochloride at 722 g/L. It currently has full registration for use to control late blight in potato and tomato, and downy mildew in lettuce and cucurbits. The product has been registered since July 14, 2010.

### Purpose of Application

The purpose of this application is to add aerial application to the Tattoo Fungicide label for use on potatoes.

### Chemistry Assessment

A chemistry assessment was not required as there were no changes to the product chemistry.

### Health Assessments

A toxicology assessment was not required as there were no changes to the product.

The addition of aerial application to potatoes on the Tattoo Fungicide label should not result in risks of concern from exposure to propamocarb hydrochloride when workers follow the label directions and wear the personal protective equipment identified on the label.

No new residue data were submitted for propamocarb hydrochloride to support the addition of an aerial application claim for potatoes. All other use directions on the product label remain the same. Based on this assessment, the noted change to the product label will not increase the dietary exposure to propamocarb hydrochloride and will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

### Environmental Assessment

The request to add aerial application on potatoes to the Tattoo Fungicide label did not trigger additional environmental data as the database is complete. The application rate for aerial

application on potatoes falls within what is currently registered for ground application on this crop. Propamocarb hydrochloride has been previously assessed for ground buffer zones for other registered end-use products containing this active.

A review was conducted for buffer zones with the outcome of no buffer zones pertaining to terrestrial or aquatic protection are required for the aerial use of Tattoo Fungicide. As such, no label amendments pertaining to the environmental protection are needed.

### **Value Assessment**

Results from a simulated aerial application trial demonstrated that the level of late blight control achieved by Tattoo Fungicide or Tattoo Fungicide and Bravo 500 (registration number 15723) at a low spray volume of 45 L/ha (simulated aerial application treatment) was comparable to that obtained for the same treatments with a commercial ground sprayer at 200 L/ha spray volume (standard ground application treatment). Additional supportive data from a published article also demonstrated that aerial application of Bravo 720 (registration number 29225, chlorothalonil) and Tattoo C Fungicide (registration number 24544, propamocarb hydrochloride and chlorothalonil) provided adequate protection against late blight in a series of field trials conducted in the USA. An aerial use-pattern for propamocarb hydrochloride will provide potato growers greater flexibility for rotating their modes of action when controlling late blight by air. The claims are supported as proposed.

### **Conclusion**

The PMRA has conducted a review of the available data and has determined that the addition of aerial application on potatoes to the Tattoo Fungicide label is acceptable.

### **References**

<b>PMRA #</b>	<b>Reference</b>
2181912	2012, Aerial Application of Tattoo Fungicide, Tattoo C Fungicide, and Tank-mixtures of Tattoo Fungicide + Bravo (chlorothalonil) Fungicides for Control of Late Blight ( <i>Phytophthora infestans</i> ) on Potato, DACO: 10.1,10.2.1,10.2.2,10.2.3.1,10.2.3.3,10.3.1,10

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