



Evaluation Report for Category B, Subcategory 2.1, 2.3, 2.4 Application

Application Number(s): 2007-5011
Application: New EP product chemistry: guarantee, identity of formulants, proportion of formulants
Product(s): Concept Liquid Insecticide
Registration Number(s): 29611
Active ingredients (a.i.): Deltamethrin, Imidacloprid
PMRA Document Number: 1863725

Purpose of Application

The purpose of this application was to register a new end-use product, Concept Liquid Insecticide, containing the active ingredients imidacloprid and deltamethrin for control of various insect pests on blueberries, Crop Group 5A Brassica, soybeans, and tomatoes. Application by ground equipment was proposed for all crops. Aerial application was also proposed for potatoes.

Chemistry Assessment

Concept Liquid Insecticide is formulated as a suspension containing imidacloprid at a nominal concentration of 75 g/L and deltamethrin at a nominal concentration of 10 g/L. This end-use product has a density of 0.9866 g/mL and pH of 3.0. The chemistry requirements for Concept Liquid Insecticide are complete.

Health Assessments

Concept Liquid Insecticide is of low acute toxicity by the oral ($LD_{50} > 2000$ mg/kg bw), dermal ($LD_{50} > 4000$ mg/kg bw), and inhalation ($LC_{50} > 5.383$ mg/L) routes of exposure in rats. It is moderately irritating to the eye and slightly irritating to the skin of rabbits, and is not considered to be a dermal sensitizer in guinea pigs.

A mixer/loader/applicator exposure assessment was conducted for Concept Liquid Insecticide using the Pesticide Handler's Exposure Database (PHED). Exposure is acceptable when mixers, loaders, and applicators wear a long-sleeved shirt, long pants, chemical-resistant gloves, and socks and boots during mixing, loading, application, cleanup, and repair. In addition, they must wear goggles or face shield during mixing, loading, clean-up, and repair. Post-application exposures for workers entering treated crops are acceptable. The use of Concept Liquid Insecticide is also acceptable in pick-your-own blueberry operations.

Residue data for deltamethrin and imidacloprid were submitted to support the use expansion of these actives on the Concept Liquid Insecticide label. In addition, processing studies in treated soybeans were also assessed to determine the potential for concentration of residues of deltamethrin and imidacloprid into processed commodities.

Based on the maximum residues observed in crop commodities treated with deltamethrin, maximum residue limits (MRLs) to cover residues of combined deltamethrin (*cis*-, *trans*- and *αR*-isomers) will be established as shown in Table 1. Residues in processed commodities not listed in Table 1 are covered under established MRLs for the raw agricultural commodities (RACs).

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

| Commodity | Application Method/ Total Application Rate (g a.i./ha) | PHI (days) | Residues (ppm) | | Experimental Processing Factor | Currently Established MRL | Recommended MRL |
|------------------|---|------------|--------------------|--------|--|---------------------------|---|
| | | | Min | Max | | | |
| Soybeans | Foliar applications/ 112 or 224 | 14-24 | All <0.05 or <0.06 | | No concentration observed in soybean processed fractions | None | 0.1 ppm |
| Potatoes | Foliar applications/ ~155 | 1-3 | All <0.0375 | | No concentration observed in potato processed fractions | None | 0.04 ppm |
| Tomatoes | Foliar applications/ ~180-190 | 3 | <0.06 | 0.15 | No concentration observed in tomato processed fractions | None | 0.3 ppm for all crops of Crop Group 8-09 Fruiting vegetables group |
| Bell peppers | | | 0.02 | 0.05 | Not applicable | None | |
| Non-bell peppers | | | 0.10 | 0.17 | Not applicable | None | |
| Cauliflower | Foliar applications/ 250 | 1 | <0.150 | <0.224 | Not applicable | None | 3.5 ppm for all crops of Crop Subgroup 5A Head and Stem Brassica subgroup |
| Broccoli | Foliar applications/ 250 | 1 | <0.23 | <0.54 | Not applicable | None | |
| Cabbage | Foliar applications/ 250 | 1 | <0.05 | <1.15 | Not applicable | None | |

Based on the dietary burden and residue data, MRLs of 0.02 ppm in eggs, meat and meat by-products of cattle, goats, hogs, horses, poultry and sheep and 0.05 ppm in milk and fat of cattle, goats, hogs, horses, poultry and sheep to cover the sum of *cis*-, *trans*- and *αR*-deltamethrin will be established.

Based on the maximum residues observed in soybeans commodities treated according to label directions, maximum residue limits (MRLs) to cover residues of total imidacloprid in/on soybeans will be established as shown in Table 2. Residues in processed commodities not listed in Table 2 are covered under established MRLs for the raw agricultural commodities (RACs). Imidacloprid residues for all the other uses proposed on the end-use product label will remain covered by the existing MRLs.

Table 2 Summary of field trial and processing data used to establish maximum residue limits (MRLs) for imidacloprid

| Commodity | Application Method/ Total Application Rate (g a.i./ha) | PHI (days) | Residues (ppm) | | Experimental Processing Factor | Currently Established MRL | Recommended MRL |
|-----------|--|------------|----------------|------|--|---------------------------|-----------------|
| | | | Min | Max | | | |
| Soybeans | Seed + foliar applications/ 226-308 | 19-32 | 0.024 | 2.04 | No concentration observed in soybean processed fractions | None | 3.5 ppm |

Based on the dietary burden and residue data, MRLs of 0.03 ppm in milk and 0.02 ppm in eggs, fat, meat and meat by-products of cattle, goats, hogs, horses, poultry and sheep to cover residues of imidacloprid including metabolites containing the 6-chloropicolyl moiety will be established.

Following the review of all available data for deltamethrin, MRLs for crops and livestock are recommended to cover residues of the sum of *cis*-, *trans*- and *αR*-deltamethrin. Residues in these crop/livestock commodities at the established MRLs will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

Following the review of all available data for imidacloprid, MRLs for soybeans and livestock are recommended to cover residues of imidacloprid including metabolites containing the 6-chloropicolyl moiety. Residues in these crop/livestock commodities at the established MRLs will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

Environmental Assessment

The proposed use of Concept Liquid Insecticide on soybeans can be supported as both active ingredients, imidacloprid and deltamethrin, are registered for use on other crops using similar application methods at application rates equal to or greater than those proposed in this application.

Aerial application on potatoes was also considered under this application. Several issues concerning this addition were identified as follows: there is a potential for an increase in exposure to non-target areas from aerial application and there remains an uncertainty regarding the risk to bees and other pollinators (on-field and in non-target habitats adjacent to treated fields) of neonicotinoid insecticides, as well as a co-formulation of two insecticides. As aerial application of imidacloprid had not been previously permitted in Canada and this application was not categorized as such (B.3.4, new application method), there was insufficient time to properly characterize the risk to bees and other non-target pollinators. As a result, aerial application of Concept Liquid Insecticide cannot be supported at this time.

Value Assessment

Twenty-six efficacy trials conducted in Canada were reviewed against the several pests in soybeans (10 trials/3 pests), tomatoes (3 trials/2 pests), potatoes (6 trials/5 pests), broccoli or cabbage (4 trials/6 pests) and blueberries (3 trials/1 pest). The application rate is within the currently registered rates for other deltamethrin and/or imidacloprid products for most of the proposed species. Extrapolation from the currently registered uses of deltamethrin and imidacloprid to Concept Liquid Insecticide was conducted for the uses not tested in the submitted efficacy trials but where the use pattern was the same.

Conclusion

The PMRA has conducted an evaluation of the subject application and found the information sufficient to support ground application for control of various insect pests on blueberries, Crop Group 5A Brassica, soybeans, and tomatoes. Aerial application of Concept Liquid Insecticide to potatoes was not supported.

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ISSN: 1911-8082

Catalogue number: xxxxxxxxxxxx (xxxxxxxxxx)

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