



## Evaluation Report for Category B, Subcategory B.3.5 Application

**Application Number:** 2009-0597  
**Application:** B.3.5 – To add rotational crops to the product label  
**Product:** Impact Herbicide  
**Registration Number:** 28141  
**Active ingredients (a.i.):** Topramezone (MTN)  
**PMRA Document Number English PDF:** 2017553

### Purpose of Application

The purpose of this application is to amend the Impact Herbicide (Impact) label (Reg. # 28141) by adding alfalfa as a rotational crop.

### Chemistry Assessment

A chemistry assessment was not required on this application.

### Health Assessments

No new residue data were submitted to support the addition of alfalfa as a rotational crop on the Impact label. Data on file from a confined and field accumulation study in rotational crops support the addition of alfalfa as a rotational crop with a plant-back interval of one year. The addition of alfalfa as a rotational crop on the Impact label will not increase the dietary exposure, and will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

### Environmental Assessment

An environmental assessment was not required on this application.

### Value Assessment

Data from a total of ten trials were provided in which the crop safety of alfalfa, planted as a rotational crop, was examined. Eight trials were conducted in Ontario and two in Pennsylvania. In all trials, field corn was planted during the treatment year and alfalfa was planted the following year. The re-crop interval ranged from 320 to 378 days (10.5 months – 12.5 months). Trials were initiated in 2000 (5 trials), 2002 (1 trial), 2003 (1 trial) and 2007 (3 trials). Treatments included (1) Impact applied alone, (2) Impact + Assist® Oil Concentrate (Assist Adjuvant) + liquid fertilizer UAN 28% (UAN) and (3) Impact + Aatrex Liquid 480 Herbicide (Aatrex) + Assist Adjuvant + UAN. Application rates for Impact for all treatments ranged from 12.5 g ai/ha (1X) to 150 g ai/ha (12X). Visual injury to alfalfa crops was assessed in eight trials and yield was reported in seven trials.

No visual injury to alfalfa crops, which were planted the year after an application of Impact + Assist Adjuvant + UAN or Impact + Aatrex + Assist Adjuvant + UAN at the registered 1X to 4X application rates for the Impact component, was reported in any trial at any of the three assessment timings (342 – 360, 361 – 400, and 401 – 431 days after treatment).

Alfalfa yield from plots treated the year before planting with an application of Impact alone, or Impact + Assist + UAN or Impact + Aatrex + Assist Adjuvant + UAN at the registered 1X to 4X application rates for the Impact component was similar to that from the untreated plots. Therefore, the addition of alfalfa as a rotational crop the year following application of Impact Herbicide can be supported from a value perspective.

### **Conclusion**

The PMRA has conducted a review of the available information for this application and has concluded that adding alfalfa as a rotational crop to the Impact Herbicide label (Reg. # 28141) is acceptable.

### **References**

#### **PMRA# Reference**

- 1721813 2008, Value 10: IMPACT Herbicide Petition for Alfalfa as a Rotational Crop the Year Following Treatment, DACO: 10.1,10.3.1,10.3.3
- 1721814 2008, Alfalfa Follow Crop Trials, DACO: 10.2.3.3

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