**Proposed Registration Decision** 

PRD2021-02

# Picarbutrazox and VAYANTIS Seed Treatment

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Publications
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6607 D
Ottawa, Ontario K1A 0K9

Internet: canada.ca/pesticides hc.pmra.publications-arla.sc@canada.ca Facsimile: 613-736-3758 Information Service: 1-800-267-6315 or 613-736-3799 hc.pmra.info-arla.sc@canada.ca



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# **Overview**

# Proposed registration decision for picarbutrazox

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the *Pest Control Products Act*, is proposing registration for the sale and use of Picarbutrazox Technical and VAYANTIS Seed Treatment, containing the technical grade active ingredient picarbutrazox, to control seed rot/pre-emergence damping-off and post-emergence damping-off in corn and soybean.

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable.

This Overview describes the key points of the evaluation, while the Science Evaluation provides detailed technical information on the human health, environmental and value assessments of picarbutrazox and VAYANTIS Seed Treatment.

# What does Health Canada consider when making a registration decision?

The key objective of the *Pest Control Products Act* is to prevent unacceptable risks to people and the environment from the use of pest control products. Health or environmental risk is considered acceptable<sup>1</sup> if there is reasonable certainty that no harm to human health, future generations or the environment will result from use or exposure to the product under its proposed conditions of registration. The Act also requires that products have value<sup>2</sup> when used according to the label directions. Conditions of registration may include special precautionary measures on the product label to further reduce risk.

To reach its decisions, the PMRA applies modern, rigorous risk-assessment methods and policies. These methods consider the unique characteristics of sensitive subpopulations in humans (for example, children) as well as organisms in the environment. These methods and policies also consider the nature of the effects observed and the uncertainties when predicting the impact of pesticides. For more information on how Health Canada regulates pesticides, the assessment process and risk-reduction programs, please visit the Pesticides section of Canada.ca.

Before making a final registration decision on picarbutrazox and VAYANTIS Seed Treatment, Health Canada's PMRA will consider any comments received from the public in response to this

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<sup>&</sup>quot;Acceptable risks" as defined by subsection 2(2) of the *Pest Control Products Act*.

<sup>&</sup>quot;Value" as defined by subsection 2(1) of the *Pest Control Products Act*: "the product's actual or potential contribution to pest management, taking into account its conditions or proposed conditions of registration, and includes the product's (a) efficacy; (b) effect on host organisms in connection with which it is intended to be used; and (c) health, safety and environmental benefits and social and economic impact."

consultation document.<sup>3</sup> Health Canada will then publish a Registration Decision<sup>4</sup> on picarbutrazox and VAYANTIS Seed Treatment, which will include the decision, the reasons for it, a summary of comments received on the proposed registration decision and Health Canada's response to these comments.

For more details on the information presented in this Overview, please refer to the Science Evaluation of this consultation document.

# What is picarbutrazox?

Picarbutrazox is a new conventional fungicide active ingredient that controls particular economically important diseases of corn and soybean.

#### **Health considerations**

Can approved uses of picarbutrazox affect human health?

VAYANTIS Seed Treatment, containing picarbutrazox, is unlikely to affect your health when used according to label directions.

Potential exposure to picarbutrazox may occur through the diet (food and drinking water), when handling and applying the end-use product, or when handling and planting treated seeds. When assessing health risks, two key factors are considered; the levels at which no health effects occur and the levels to which people may be exposed. The dose levels used to assess risks are established to protect the most sensitive human population (for example, children and nursing mothers). As such, sex and gender are taken into account in the risk assessment. Only uses for which the exposure is well below levels that cause no effects in animal testing are considered acceptable for registration.

Toxicology studies in laboratory animals describe potential health effects from varying levels of exposure to a chemical and identify the dose level at which no effects are observed. The health effects noted in animals occur at doses more than 100-times higher (and often much higher) than levels to which humans are normally exposed when pesticide products are used according to label directions.

In laboratory animals, the technical grade active ingredient picarbutrazox was of low acute toxicity via the oral, dermal and inhalation routes. It was minimally irritating to the eyes and non-irritating to the skin. It did not cause an allergic skin reaction.

<sup>&</sup>quot;Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

<sup>&</sup>quot;Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

The end-use product VAYANTIS Seed Treatment, containing picarbutrazox, was of low acute toxicity via the oral, dermal, and inhalation routes. It was minimally irritating to the eyes and non-irritating to the skin. It did not cause an allergic skin reaction.

Registrant-supplied short-term and long-term (lifetime) animal toxicity tests were assessed for the potential of picarbutrazox to cause neurotoxicity, chronic toxicity, cancer, reproductive and developmental toxicity, and various other effects. The most sensitive endpoints for risk assessment were effects on the liver and thyroid in rats. There was no evidence of increased sensitivity of the young. Thyroid tumours were noted in male and female rats at the highest dose tested, however, there was no evidence to suggest that picarbutrazox damaged genetic material. The risk assessment protects against the effects noted above and other potential effects by ensuring that the level of exposure to humans is well below the lowest dose at which these effects occurred in animal tests

### Residues in food and drinking water

# Dietary risks from food and drinking water are not of health concern.

Animal studies revealed no acute health effects. Consequently, a single dose of picarbutrazox is not likely to cause acute health effects in the general population (including infants and children).

On the strength of the overall information, a threshold approach was considered appropriate for the cancer risk assessment based on the observed thyroid follicular cell adenomas in rats. Overall the endpoints selected for the non-cancer dietary risk assessment are considered protective of these findings.

Aggregate chronic (non-cancer and cancer) dietary intake estimates (food plus drinking water) for the general population and all population subgroups are expected to be less than or equal to 3% of the acceptable daily intake, and are not of health concern.

The *Food and Drugs Act* prohibits the sale of adulterated food, that is, food containing a pesticide residue that exceeds the established maximum residue limit (MRL). Pesticide MRLs are established for *Food and Drugs Act* purposes through the evaluation of scientific data under the *Pest Control Products Act*. Food containing a pesticide residue that does not exceed the established MRL does not constitute a health risk of concern.

Residue trials conducted throughout Canada and the United States using picarbutrazox as a seed treatment on soybean and on field corn, sweet corn and popcorn are acceptable. The MRLs for this active ingredient can be found in the Science Evaluation of this consultation document.

#### Occupational risks from handling VAYANTIS Seed Treatment

Occupational risks are not of health concern when VAYANTIS Seed Treatment is used according to the proposed label directions, which include protective measures.

Workers treating seeds with VAYANTIS Seed Treatment in commercial facilities or with commercial mobile treaters as well as workers planting treated seeds, may come into direct contact with picarbutrazox residues on the skin and through inhalation. Therefore, the label of VAYANTIS Seed Treatment specifies that treatment must be conducted with a closed-transfer system only. In addition, workers must wear long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes during mixing, loading, application, cleaning, bagging, sewing, stacking, as well as during handling and planting of treated seeds. Taking into consideration these label statements, the rate of application and the duration of exposure for handlers and workers, health risks to these individuals are not of concern.

#### Health risks to bystanders

Bystander risks are not of health concern when VAYANTIS Seed Treatment is used according to the proposed label directions and drift restrictions are observed.

A standard label statement to protect against drift during application is on the label. Therefore, health risks to bystanders are not of concern.

#### **Environmental considerations**

What happens when picarbutrazox is introduced into the environment?

When used according to label directions, the risks associated with the use of picarbutrazox are acceptable from the viewpoint of environmental protection.

Picarbutrazox will remain in the soil for up to 2 to 3 months depending on the soil type and conditions; however, when considering the breakdown-products of picarbutrazox, the combination of picarbutrazox and its breakdown products can remain in the soil for up to a year depending on the soil type and conditions. It will not move from the treatment area into the air and, therefore, will not move to another area by movement through the air. Picarbutrazox is not expected to move downward in the soil, and, therefore, is unlikely to reach groundwater; however, many of its breakdown-products can move downward in the soil and reach groundwater. Picarbutrazox has low potential to move off the treatment area to reach surface waters such as ponds, streams and rivers. If it does enter water, picarbutrazox will move to the sediment where it will not remain for a long period of time. Picarbutrazox is not expected to accumulate in plant or animal tissue.

When picarbutrazox is used in accordance with the label directions and the required precautions, the risk to terrestrial invertebrates, birds, wild mammals, bees, beneficial arthropods, terrestrial plants, aquatic invertebrates (including sediment-dwelling invertebrates), amphibians, fish, algae and vascular aquatic plants from the use of picarbutrazox were determined to be acceptable without the requirement of additional risk mitigation measures.

#### Value considerations

#### What is the value of VAYANTIS Seed Treatment?

Picarbutrazox is the active ingredient in VAYANTIS Seed Treatment. The registration of this product will provide Canadian growers with a unique mode of action to manage important fungal diseases in corn and soybean while mitigating the risk of resistance development by causal pathogens to other fungicides that are registered to control the same diseases.

VAYANTIS Seed Treatment is applied to seed of corn and soybean to control seed rot/preemergence damping-off and post-emergence damping off that can reduce crop stands.

#### Measures to minimize risk

Labels of registered pesticide products include specific instructions for use. Directions include risk-reduction measures to protect human and environmental health. These directions must be followed by law.

The key risk-reduction measures being proposed on the label of Picarbutrazox Technical and VAYANTIS Seed Treatment to address the potential risks identified in this assessment are as follows.

# **Key risk-reduction measures**

#### Human health

To reduce the potential of workers coming into direct contact with picarbutrazox on the skin or through inhalation, workers must wear long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes during mixing, loading, applying, cleaning, bagging, sewing, stacking, as well as during handling and planting of treated seeds. The label also specifies that commercial seed treatment must be conducted with closed-transfer system only. Furthermore, a standard label statement to protect against drift during application is present on the label.

#### **Environment**

- Precautionary statements are required to inform users of the toxicity of picarbutrazox to aquatic organisms.
- Precautionary statements are required for the labeling of treated seed.
- Precautionary statements are required to inform users of the potential for leaching.

# Next steps

Before making a final registration decision on picarbutrazox and VAYANTIS Seed Treatment, Health Canada's PMRA will consider any comments received from the public in response to this consultation document. Health Canada will accept written comments on this proposal up to 45 days from the date of publication of this document. Please note that, to comply with Canada's international trade obligations, consultation on the proposed MRLs will also be conducted internationally via a notification to the World Trade Organization. Please forward all comments to Publications (contact information on the cover page of this document). Health Canada will then publish a Registration Decision, which will include its decision, the reasons for it, a summary of comments received on the proposed decision and Health Canada's response to these comments.

#### Other information

When Health Canada makes its registration decision, it will publish a Registration Decision on picarbutrazox and VAYANTIS Seed Treatment (based on the Science Evaluation of this consultation document). In addition, the test data referenced in this consultation document will be available for public inspection, upon application, in the PMRA's Reading Room (located in Ottawa).

# **Science evaluation**

#### **Picarbutrazox and VAYANTIS Seed Treatment**

# 1.0 The active ingredient, its properties and uses

#### 1.1 Identity of the active ingredient

**Active substance** Picarbutrazox

**Function** Fungicide

Chemical name

1. International Union of Pure and Applied Chemistry (IUPAC)

tert-butyl (6-{[(Z)-(1-methyl-1H-5-tetrazolyl)

(phenyl)methylene]aminooxymethyl}-2-pyridyl)carbamate

2. Chemical Abstracts Service (CAS) 1,1-dimethylethyl N-[6-[[[(Z)-[(1-methyl-1H-tetrazol-5-yl)

phenylmethylene]amino]oxy]methyl]-2-

pyridinyl]carbamate

**CAS number** 500207-04-5

**Molecular formula** C<sub>20</sub>H<sub>23</sub>N<sub>7</sub>O<sub>3</sub>

Molecular weight 409.44 g/mol

Structural formula

**Purity of the active** 

ingredient

97.5%

# 1.2 Physical and chemical properties of the active ingredients and end-use product

#### Technical product—Picarbutrazox technical

| Property                  | Result                           |
|---------------------------|----------------------------------|
| Colour and physical state | White solid (crystalline powder) |
| Odour                     | None                             |
| Melting range             | 136.6–138.7°C                    |

| Property                          | Result                           |   |  |
|-----------------------------------|----------------------------------|---|--|
| Boiling point or range            | Decomposes at >150°C             |   |  |
| Density                           | 1.2541–1.2639 g/cm <sup>3</sup>  |   |  |
| Vapour pressure at 20°C           | $<1.2 \times 10^{-7} \text{ Pa}$ |   |  |
| Ultraviolet (UV)-visible          | $\lambda_{max}$ is 221.5 nm in a | cidic and neutral media (smaller peaks at |  |
| spectrum                          |                                  | n acidic and at 280.5 nm in neutral), and |  |
|                                   | 223.0 nm in basic me             | edium (smaller peak at 282.5 nm).         |  |
| Solubility in water at 20°C       | 0.333 mg/L                       |   |  |
| Solubility in organic solvents at | Solvent Solu                     | bility (g/L)                              |  |
| 20°C                              | <i>n</i> -Hexane                 | 0.103                                     |  |
|                                   | <i>n</i> -Heptane                | 0.106                                     |  |
|                                   | <i>n</i> -Octanol                | 3.32                                      |  |
|                                   | Ethanol                          | 15.0                                      |  |
|                                   | Methanol                         | 34.8                                      |  |
|                                   | Xylene                           | 21.2                                      |  |
|                                   | Toluene                          | 49.8                                      |  |
|                                   | Ethyl acetate                    | 185                                       |  |
|                                   | Dichloromethane                  | >250                                      |  |
|                                   | Acetone                          | >250                                      |  |
| <i>n</i> -Octanol-water partition | $\log K_{\rm ow} = 4.16$         |   |  |
| coefficient $(K_{ow})$            |                                  |   |  |
| Dissociation constant (p $K_a$ )  | pKa = 2.95                       |   |  |
| Stability (temperature, metal)    | Stable up to 150°C.              |   |  |

# End-use product—VAYANTIS seed treatment

| Property                           | Result  |
|------------------------------------|---|
| Colour                             | Off-white   |
| Odour                              | No particular odour   |
| Physical state                     | Liquid  |
| Formulation type                   | Flowable concentrate (suspension)   |
| Label concentration                | 400 g/L   |
| Container material and description | High-density polyethylene (HDPE), 1–1050 L  |
| Density                            | 1.11 g/mL   |
| pH of 1% dispersion in water       | 6–8   |
| Oxidizing or reducing action       | Compatible with oxidizing agents, reducing agents, fire extinguishing agents and water. |

| Property                  | Result  |  |
|---------------------------|---|--|
| Storage stability         | Stable in non-fluorinated HDPE packaging under accelerated (54°C for 2 weeks) conditions. |  |
| Corrosion characteristics | Not corrosive to its HDPE packaging.  |  |
| Explodability             | Not explosive   |  |

#### 1.3 Directions for use

VAYANTIS Seed Treatment is applied to seed of corn (field, sweet, pop, seed) at 2.5–12.5 mL/100 kg seed and to soybean at 2.5–6.25 mL/100 kg seed to control seed rot/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. In corn, the minimum rate is for use in fields with a known low level of pre-emergence damping-off while a mid-rate (for example, 6.25 mL/100 kg seed) is for use in fields with higher levels of pre-emergence damping-off. A rate in the upper end of the range is for use in fields with a known history of post-emergence damping-off. In soybean, the minimum and maximum rates are for use in fields with known low levels and higher levels of damping-off, respectively. VAYANTIS Seed Treatment may be also tank-mixed with other seed treatment fungicides and/or insecticides to broaden disease spectrum and to protect from insect pest damage.

#### 1.4 Mode of action

The mode of action of picarbutrazox is not conclusively known. However, it is known to have a unique mode of action as there is no cross-resistance to other fungicides that are active on the same pathogens. Picarbutrazox is classified as a group U17 fungicide by the Fungicide Resistance Action Committee (FRAC).

# 2.0 Methods of analysis

#### 2.1 Methods for analysis of the active ingredient

The methods provided for the analysis of the active ingredient and impurities in the technical product have been validated and assessed to be acceptable.

#### 2.2 Method for formulation analysis

The methods provided for the analysis of the active ingredient in the formulations have been validated and assessed to be acceptable for use as enforcement analytical methods.

# 2.3 Methods for residue analysis

High performance liquid chromatography methods with tandem mass spectrometry (HPLC-MS/MS) were developed and proposed for data generation and enforcement purposes in environmental media, plant matrices (AOAC Official Method 2007.1 and QuEChERS-multiresidue method) and in animal matrices (QuEChERS-multiresidue method).

HPLC-MS/MS Methods 83966 and RES-00155 were developed for the determination of residues of picarbutrazox and metabolites TZ-1E, TZ-2-β-Glc, TZ-5 and TZ-5-Glc, and metabolites TT-1 and TT-3 for data gathering purposes in plant matrices. These methods fulfilled the requirements with regards to specificity, accuracy and precision at the respective method limit of quantitation.

Acceptable recoveries (70–120%) were obtained in environmental media and in plant and animal matrices. The proposed enforcement methods were successfully validated in plant and animal matrices by an independent laboratory. Extraction solvents used in the plant and livestock enforcement methods were similar to those used in the plant and livestock metabolism studies; thus, further demonstration of extraction efficiency with radiolabelled plant and animal matrices was not required.

Methods for residue analysis are summarized in Appendix I, Tables 1a and 1b.

# 3.0 Impact on human and animal health

## 3.1 Toxicology summary

Picarbutrazox is a tetrazolyloxime fungicide with a new pesticidal mode of action, the details of which have not been fully elucidated.

A detailed review of the toxicology database for picarbutrazox was conducted. The database is complete, consisting of the full array of toxicity studies currently required for hazard assessment purposes. Additional studies included mechanistic studies examining liver and thyroid toxicity pathways and studies assessing the toxicity of select metabolites of picarbutrazox. The studies were carried out in accordance with currently accepted international testing protocols and Good Laboratory Practices. The scientific quality of the data is high and the database is considered adequate to characterize the potential health hazards associated with picarbutrazox.

Metabolism and toxicokinetics following single dose administration in the rat were investigated using picarbutrazox radiolabelled at the phenyl or pyridine ring. Based on the results of a biliary excretion study, picarbutrazox was well absorbed at low dose levels, with peak plasma concentrations occurring between 2 and 6 hours post-dosing. Absorption as a percentage of the administered dose (AD) decreased with increasing dose level, such that absorption was less than 30% of the AD at 100 mg/kg bw. At final sacrifice, which occurred 4 days post-dosing, the highest residues were found in the gut and gut contents, liver, prostate, fat, and adrenal glands. Elimination of orally-administered picarbutrazox was rapid and extensive. The majority of the AD was recovered in the excreta within 48 hours. The major route of excretion was via the feces, representing more than 80% of AD for low dose and more than 93% of AD for high dose. Recovered radiolabel in bile accounted for 77–80% of AD for low dose and 14–23% of AD for high dose. Radiolabel recovery in urine was 8–10% of AD for low dose and 1–2% of AD for high dose.

Radioactivity in tissues 96 hours after single oral dose administration was low and there was no evidence of retention within tissues. The metabolic and toxicokinetic parameters measured were generally comparable between sexes, though high-dose absorption was slightly lower in females than in males.

The phenyl- or pyridine-labelled picarbutrazox assays yielded 11 to 18 identified metabolites in urine, bile, or feces. Unchanged picarbutrazox was not identified in urine or bile, indicating extensive metabolism. The major metabolic transformation routes for picarbutrazox involved hydroxylation, hydrolysis, or a ring closure to form a 5,5-dimethyloxazolidin-2-one group. Glucuronide conjugates were observed for multiple metabolites.

In acute toxicity testing, picarbutrazox was of low acute toxicity via the oral, dermal, and inhalation routes in rats. It was minimally irritating to the eyes and non-irritating to the skin of rabbits. Picarbutrazox was negative for skin sensitization in guinea pigs when tested using the Maximization method

VAYANTIS Seed Treatment was of low acute toxicity via the oral, dermal, and inhalation routes in rats. It was minimally irritating to the eyes and non-irritating to the skin of rabbits, and was negative for skin sensitization when tested in mice using the local lymph node assay. In addition, an isolated chicken eye assay showed that the product was non-irritating.

The liver was identified as a target of toxicity for picarbutrazox following repeated dietary exposure in mice and rats. The thyroid was also affected in multiple studies in the rat. In addition to weight changes in these organs, histopathological alterations were observed in several studies. Liver effects observed among mice and rats included increased weight, hepatocyte enlargement, vacuolation, cellular inclusions, eosinophilic foci, fatty change, cystic degeneration, elevated liver enzymes, and clinical chemistry alterations. Thyroid effects included increased weight and follicular cell hypertrophy or hyperplasia in rats in short-term and long-term dietary studies. Thyroid hormone levels were also affected in multiple short-term dosing studies in rats. Other effects observed in mice and rats were usually confined to a single study or at dose levels near the limit dose.

Following repeated oral dietary exposure in dogs, decreases in body weight and body weight gain were observed. Liver weights were increased and hepatocellular hypertrophy was observed. Gallbladder weights were also increased, but without any histopathological correlates. In the 12-month study, alkaline phosphatase and alanine aminotransferase were increased while albumin was decreased. Dogs were found to be less sensitive to picarbutrazox than mice and rats. There was no evidence that longer duration of dosing increased toxicity in dogs.

No systemic toxicity occurred in rats following daily dermal application of picarbutrazox up to the limit dose for 28 days.

In a supplementary 5-day inhalation toxicity study in rats, hepatocellular hypertrophy and thyroid follicular cell hypertrophy were observed at the mid-dose level. At the high-dose level, breathing difficulties were noted as well as increased thyroid and parathyroid weight, tracheal epithelial alteration, macrophage accumulation in the lungs, and decreased body weight over the first two days.

In the rat acute gavage neurotoxicity study, there was no evidence of neurotoxicity up to the limit dose. The short-term rat dietary toxicity studies with functional observational battery components also showed no evidence of selective neurotoxicity in the parameters examined.

There was no evidence of genotoxicity in a battery of in vitro and in vivo genotoxicity studies conducted with picarbutrazox. An increased number of thyroid follicular cell adenomas was observed in both males and females of the high-dose group in the rat combined chronic toxicity/carcinogenicity study. A mode of action (MOA) for the development of the thyroid tumours in rats was proposed by the applicant in conjunction with supplied mechanistic studies to support this proposed MOA. Specifically, the applicant referred to the hypothalamic-pituitarythyroid axis perturbation MOA commonly associated with phenobarbital. This MOA states that administration of the test substance induces hepatic drug-metabolizing enzymes. These enzymes also clear circulating T4 hormones. The pituitary increases thyroid stimulating hormone (TSH) production to counter this effect which leads to increased thyroid activity and eventually tumours. The provided mechanistic data included plasma thyroid hormone measurements in multiple studies, a thyroid peroxidase activity study, and a hepatic drug metabolizing enzyme induction study. These data, in conjunction with the full toxicity database, were supportive of the proposed MOA, though the low incidences of follicular cell hyperplasia and the lack of reversibility data were noted as limitations. Other possible tumourigenic MOAs were considered inconsistent with the available data, such as the negative results in the genotoxicity battery and a thyroid peroxidase activity study. Although rats have been shown to be considerably more sensitive to the tumour precursor events, this tumourigenic mode of action has not been excluded from being relevant to humans. Overall, the weight of evidence supported the proposed MOA and a threshold approach for risk assessment was considered appropriate. As such, a separate cancer risk assessment was not necessary.

The rat 2-generation dietary reproductive toxicity study with picarbutrazox revealed liver and thyroid toxicity in parents and offspring, consistent with the observations from the short-term toxicity studies. There were no effects on reproductive parameters. In the F2 generation, body weights were decreased during the latter half of the postnatal period and thyroid hypertrophy was observed in weanlings at terminal necropsy. The thyroids of the F1 generation were not subject to histopathological assessment at weaning. There was no evidence of sensitivity of the young.

In the gavage developmental toxicity studies, there was no evidence of sensitivity of the young in either rats or rabbits. Maternal and fetal rats were tested up to the limit dose and no adverse effects were observed. In rabbits, maternal animals showed thin appearance and body weight loss over gestation days 6 to 9, as well as decreased body weight, body weight gain, and food consumption at the limit dose.

Fetal rabbits at the same dose level showed an increased number of ribs and corresponding thoracic vertebrae, along with a decreased number of lumbar vertebrae. This fetal effect was observed in the presence of maternal toxicity and is not considered serious.

The toxicity of select isomers and metabolites of picarbutrazox were investigated to a limited extent in acute, genotoxicity, and short-term dietary toxicity studies. TZ-4 tested positive with a single strain of *S. typhimurium* in a bacterial reverse mutation assay. In acute oral toxicity tests in rats, treatment with TZ-2, TZ-5, or TY-2 resulted in mortalities at 2000 mg/kg bw, whereas dosing with picarbutrazox did not produce mortalities at this dose level in rats. Clinical signs of toxicity were limited to decreased activity following dosing with 300 mg/kg bw of TZ-5, which had cleared by six hours post-dosing. Repeat-dose dietary testing with TZ-5 suggests possible effects on the kidney and nasal epithelia that were not observed in the picarbutrazox studies, but the effect levels in these studies were higher than with picarbutrazox. In a rat 90-day dietary study with TT-3K, body weight and body weight gain were decreased in females at the highest dose level. A 90-day dietary study in rats with TZ-1E produced liver weight effects, hepatocellular hypertrophy, and some clinical chemistry effects. With the limited information available, for the purposes of risk assessment, the isomers and metabolites were considered to be of equivalent toxicity to picarbutrazox.

The identification of select isomers and metabolites is presented in Appendix I, Table 2. Results of the toxicology studies conducted on laboratory animals with picarbutrazox and its associated end-use product are summarized in Appendix I, Tables 3 and 4, respectively. The toxicology reference values for use in the human health risk assessment are summarized in Appendix I, Table 5.

#### 3.1.1 Pest Control Products Act hazard characterization

For assessing risks from potential residues in food or from products used in or around homes or schools, the *Pest Control Products Act* requires the application of an additional 10-fold factor to threshold effects to take into account completeness of the data with respect to the exposure of, and toxicity to, infants and children, and potential prenatal and postnatal toxicity. A different factor may be determined to be appropriate on the basis of reliable scientific data.

With respect to the completeness of the toxicity database as it pertains to the toxicity to infants and children, the database contains the full complement of required studies including oral gavage developmental toxicity studies in rats and rabbits, and a dietary 2-generation reproductive toxicity study in rats.

With respect to potential prenatal and postnatal toxicity, there was no evidence of increased sensitivity of the fetus or offspring compared to parental animals in either the developmental toxicity or reproductive toxicity studies. In the 2-generation reproductive toxicity study, decreased body weights and increased thyroid hypertrophy were observed in offspring at a higher dose level than increased thyroid weight and thyroid hypertrophy in the parental animals.

In the developmental toxicity study in rats, no fetal toxicological effects were observed. In the developmental toxicity study in rabbits, the mean number of fetal ribs and thoracic vertebrae were increased at the highest dose level. At the same dose level, dams had decreased body weight, body weight gain, and food consumption.

Overall, the database is adequate for determining the sensitivity of the young. There is a low level of concern for sensitivity of the young as effects on the young are well characterized and occurred in the presence of maternal toxicity. Therefore, the *Pest Control Products Act* factor (PCPA factor) was reduced to onefold for the current assessment of picarbutrazox.

#### 3.2 Toxicology reference values

#### 3.2.1 Acute reference dose (ARfD)

The only endpoint of concern potentially attributable to a single exposure was observed at a limit dose. Therefore, an acute reference dose is not required.

#### 3.2.2 Acceptable daily intake (ADI)

To estimate risk following repeated dietary exposure, a NOAEL of 2.3 mg/kg bw/day from the 2-year dietary chronic toxicity/carcinogenicity study in the rat was selected. At the LOAEL of 7.8 mg/kg bw/day, effects on the thyroid and liver were observed. Standard uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability were applied. As discussed in the *Pest Control Products Act* Hazard Characterization section, the PCPA factor was reduced to onefold. The composite assessment factor (CAF) is thus 100.

The ADI is calculated according to the following formula:

$$ADI = \underbrace{NOAEL}_{CAF} = \underbrace{2.3 \text{ mg/kg bw/day}}_{100} = 0.02 \text{ mg/kg bw/day of picarbutrazox}$$

The ADI provides a margin of 390 to the NOAEL for thyroid follicular cell adenomas in the rat.

#### 3.2.3 Short- and intermediate-term dermal

For short- and intermediate-term dermal risk assessment, a NOAEL of 1000 mg/kg bw/day from the 28-day dermal toxicity study in rats was selected, which was the highest dose level tested in this study. This study was conducted via the relevant route and was of an appropriate duration of exposure.

The target margin of exposure (MOE) for this scenario is 100, which includes uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability. The selection of this study and target MOE is considered to be protective of all populations, including nursing infants and the unborn children of exposed female workers.

#### 3.2.4 Short- and intermediate-term inhalation

The only repeat-dose inhalation toxicity study available was a supplemental 5-day dose range-finding study; therefore, the use of NOAELs from the oral toxicity studies for these exposure scenarios was appropriate.

For short-term inhalation risk assessment, the NOAEL of 15 mg/kg bw/day from the 28-day dietary rat toxicity study was selected. Toxicity was observed in the form of effects on the liver and thyroid at the LOAEL of 150 mg/kg bw/day.

For intermediate-term inhalation risk assessment, the parental NOAEL of 2.9 mg/kg bw/day from the 2-generation reproductive toxicity study in the rat was selected. Toxicity was observed in the form of effects on the thyroid at the LOAEL of 12 mg/kg bw/day.

The target MOE for all inhalation scenarios is 100, which includes uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability. The selection of these studies and target MOE is considered to be protective of all populations, including nursing infants and the unborn children of exposed female workers.

#### 3.3 Cancer assessment

There was adequate evidence to support a threshold-based mechanism to the thyroid follicular cell tumours in rats. The ADI and the selected reference values for occupational exposure provide sufficient margins to this tumour.

#### 3.4 Occupational and residential exposure assessment

#### 3.4.1 Acute hazards of end-use product and mitigation measures

The acute hazard assessment indicated that VAYANTIS Seed Treatment is of low acute toxicity via the oral, dermal, and inhalation routes in rats. It was minimally irritating to the eyes and non-irritating to the skin of rabbits, and was negative for skin sensitization when tested in mice using the local lymph node assay. Based on these acute hazards, a long-sleeved shirt, long pants, socks, shoes, and chemical-resistant gloves are required for workers during mixing, loading, application, clean-up and repair to protect from any acute health hazards of concern.

# 3.4.2 Occupational exposure and risk assessment

VAYANTIS Seed Treatment is a suspension-formulated product for commercial seed treatment of corn (field, pop, sweet and seed) and soybean in commercial facilities or by mobile treaters.

Workers have the potential for exposure to picarbutrazox while treating seeds in commercial seed treatment facilities or by using commercial mobile treaters, both equipped with a closed-transfer system, as well as during bagging, sewing and stacking bags of treated seeds, and during calibration, cleaning and repair of equipment. Potential exposure can also occur during handling and planting of treated seeds. Occupational exposure to picarbutrazox is expected to occur

predominantly via the dermal and inhalation routes for mixers, loaders, other seed treatment workers, and planters. Exposure duration is characterized as intermediate-term for commercial workers and short-term for planters.

#### 3.4.2.1 Dust-off study

The submitted dust-off study was conducted to compare the dust-off potential of corn and soybean seed untreated or treated with VAYANTIS Seed Treatment, or treated with other seed treatment products, formulated as suspensions. A polymer was added in the slurry of the seed treatment formulations intended for corn seeds. Treated seed samples were measured using a Heubach dust measurement apparatus in grams of dust per 100 kilograms of seeds.

Based on the average dust-off levels measured in this study, the general trend for seed-type effect identified treated corn seeds as being dustier than treated soybean seeds, even when the slurry applied to corn seeds contained a dust-reducing coating polymer. Regarding the formulation effect, treatment with any of the products decreased the dust-off levels from soybean and corn seeds when compared to untreated seeds. Regarding the treatment effects, the dust-off levels for both soybean seeds and corn seeds, when treated with any product, were comparable. Although some limitations were noted, the submitted dust-off study was well conducted and scientifically acceptable.

Based on the submitted dust-off data generated with VAYANTIS Seed Treatment, the use of unit exposure estimates from the selected surrogate passive dosimetry exposure studies is not expected to underestimate occupational exposure of seed treatment workers and planters.

#### 3.4.2.2 Commercial seed treatment exposure and risk assessment

VAYANTIS Seed Treatment can be used for the commercial treatment, including treatment by mobile treaters, of seeds of corn (field, pop, sweet and seed) and soybean.

As chemical-specific unit exposure data were not submitted for VAYANTIS Seed Treatment, surrogate passive dosimetry exposure studies owned by the Agricultural Handlers Exposure Task Force (AHETF), of which the applicant is a member and has full access to the data, were used to estimate the worker exposure.

The choice of the surrogate exposure study was based on results of the dust-off study, and also on various key factors influencing the exposure scenario, such as the formulation type, the seed type, the facility, the mixing/loading and treating equipment, the workers' tasks, the exposure duration, the personal protective equipment (PPE) and engineering controls, as well as the quality of the data, such as the number of replicates, the validation recoveries and the unit exposure results.

To assess the exposure from treating corn and soybean seeds, the AH806 2010 study is the most appropriate. The study was conducted in a commercial facility and separately monitored the treatment of corn and canola seeds. As such, the unit exposure estimates derived from the corn data, based on workers wearing a long-sleeved shirt, long pants and chemical-resistant gloves, were used in the risk assessments for corn and soybean seeds.

Based on the dust-off study results, corn seeds generally produce more dust than soybean seeds. In addition, the dust-off levels for both corn seeds and soybean seeds, when treated with any product, were comparable. Therefore, the use of corn data is not expected to underestimate exposure to workers treating corn or soybean seeds.

For treaters, baggers, sewers and stackers, daily dermal or inhalation exposure was calculated by coupling the dermal or inhalation unit exposure estimates with the amount of active ingredient handled per day obtained from the active ingredient application rate and the amount of seeds treated in a day (in other words, commercial throughput). For cleaners, the exposure estimates were calculated by coupling the dermal or inhalation unit exposure estimates with the active ingredient application rate. The daily dermal and inhalation exposures were normalized to mg/kg bw/day by using the default adult body weight. Dermal and inhalation exposures were not combined since the toxicology reference values are based on different toxicology effects. To assess health risks, exposure estimates were compared to the toxicology reference values presented in Section 3.4.1 to obtain the MOEs. The target MOE for both dermal and inhalation exposure was 100.

As presented in Appendix I, Table 6, the dermal and inhalation MOEs obtained are above the target MOE of 100. Hence, no health risks of concern are expected for commercial seed treatment workers and mobile treaters handling VAYANTIS Seed Treatment provided that they use closed-transfer equipment and wear the required PPE.

Taking into account both the acute toxicity of the end-use product and the risk assessment of picarbutrazox, workers are required to wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks, and shoes.

# 3.4.2.3 Exposure and risk assessment for planting seeds commercially treated with VAYANTIS Seed Treatment

Commercially treated seeds are either bagged or stored in bulk. During planting, workers load the treated seeds into a planter from bags or from bulk containers using an auger. As such, workers have the potential for exposure to VAYANTIS Seed Treatment while loading and planting treated seeds.

To assess the exposure scenarios of planting treated corn and soybean seeds, the PMRA selected the AH825 2007 surrogate exposure study, which is owned by the AHETF. This is a well conducted study with no major limitations. It monitored workers opening paper bags of treated corn seeds; manually loading them in the planter; unloading the remaining seeds; planting using a closed-cab tractor and performing small repairs. The use of unit exposure values from this

study is not expected to underestimate exposure to workers loading seeds from bulk containers since the exposure from this scenario is lower than the exposure from loading seeds from bags. Furthermore, as shown in the dust-off study, corn seeds are dustier than soybean seeds and the dust-off levels, when treated with any product, were comparable. Therefore, the use of corn data is not expected to underestimate exposure to workers planting corn or soybean seeds.

Daily dermal or inhalation exposure was estimated by coupling the dermal or inhalation unit exposure values from the AH825 2007 surrogate exposure study with the amount of active ingredient handled per day obtained from the active ingredient application rate and the amount of seeds planted in a day. The daily dermal and inhalation exposures were normalized to mg/kg bw/day by using the default adult body weight. Dermal and inhalation exposures were not combined since the toxicology reference values are based on different toxicology effects. To assess health risks, exposure estimates were compared to the toxicology reference values presented in Section 3.4.1 to obtain the MOEs. The target MOE for both dermal and inhalation exposure was 100.

As presented in Appendix I, Table 7, the dermal and inhalation MOEs obtained are well above the target MOE of 100. Hence, no health risks of concern are expected for planters of VAYANTIS Seed Treatment-treated seeds provided that they use the PPE and engineering controls recommended based on the surrogate exposure study. The unit exposure values derived from AH825 2007 study represented workers wearing a long-sleeved shirt, long pants and chemical-resistant gloves and using closed-cab planters. However, since the calculated MOEs are well above the target MOE of 100, the requirement of closed-cab planters can be waived.

#### 3.4.3 Residential exposure and risk assessment

#### 3.4.3.1 Handler exposure and risk assessment

VAYANTIS Seed Treatment is not a domestic class product; therefore, a residential handler exposure assessment is not required.

#### 3.4.3.2 Postapplication exposure and risk assessment

VAYANTIS Seed Treatment is not a domestic class product and is not for use in residential settings; therefore, a residential postapplication exposure assessment is not required.

#### 3.4.4 Bystander exposure and risk assessment

Bystander exposure should be negligible since the product will be used in commercial seed treatment facilities or by mobile treaters and the likelihood for drift during the treatment of seeds is expected to be minimal. Therefore, bystander exposure and risk are not of health concern.

# 3.5 Dietary exposure and risk assessment

#### 3.5.1 Residues in drinking water sources

Environmental concentrations of picarbutrazox in potential drinking water sources were estimated using numerical models for the human health risk assessment. Modelling was conducted using the Pesticides in Water Calculator (PWC) version 1.52, using standard PMRA scenarios which take into account regional weather and soil characteristics as well as relevant plant properties.

A subset of use patterns was considered for the modelling, which is intended to represent all labelled uses. The use-pattern selected for the modelling was for seed treatment at a rate of 2.725 g a.i./ha. Modelling inputs for drinking water estimated environmental concentrations (EECs) differ from environmental fate parameters given the residue definition (Table 3.5.1.1 Major fate input parameters for the drinking water modelling.1).

Table 3.5.1.1 Major fate input parameters for the drinking water modelling

| Fate parameter                   | Value (drinking water)   |
|----------------------------------|--|
| Residues modelled                | Picarbutrazox, TZ-1E, TZ-2, TZ-4, TT-3, TZ-5, and TY-2           |
| Adsorption $K_d$ (mL/g)          | 24.3 for picarbutrazox ( $20^{th}$ percentile of 6 $K_d$ values) |
|                                  | 7.8 for TZ-2 ( $20^{th}$ percentile of 7 $K_d$ values)           |
|                                  | 0.004 for TT-3 (estimated by EPISuite)                           |
| Hydrolysis half-life at pH 7 and | Stable (assumed)   |
| 20°C (days)                      |  |
| Photolysis half-life in water at | 4140 (with aqueous phototransformation products)                 |
| 35°N latitude (days)             |  |
| Aerobic soil biotransformation   | 46 for picarbutrazox   |
| half-life at 20°C (days)         | 30 for TZ-2  |
|                                  | stable for TT-3  |
| Aerobic aquatic                  | 146 (the longer of two half-lives)                               |
| biotransformation half-life at   |  |
| 20°C (days)                      |  |
| Anaerobic aquatic                | 526 (the longer of two half-lives)                               |
| biotransformation half-life at   |  |
| 20°C (days)                      |  |

For surface water, PWC calculates the amount of pesticide entering the water body by run-off and drift, and the subsequent degradation of the pesticide in the water system. EECs are calculated by modelling a total land area of 173 ha draining into a 5.3 ha reservoir with a depth of 2.7 m. Groundwater EECs are calculated by simulating leaching through a layered soil profile and reporting the average concentration in the top 1 meter of a water table. Estimated concentrations in drinking water sources are presented in Table 3.5.1.2.

Table 3.5.1.2 Level 1 EECs for the combined residue of picarbutrazox in potential sources of drinking water, expressed as picarbutrazox equivalent

| Use pattern  | Groundwater<br>(μg a.i./L) |                     | Surface water<br>(μg a.i./L) |                     |                      |
|--|----------------------------|---------------------|------------------------------|---------------------|----------------------|
|  | Daily <sup>1</sup>         | Yearly <sup>2</sup> | Daily <sup>3</sup>           | Yearly <sup>4</sup> | Overall <sup>5</sup> |
| Seed treatments, modelled as 1 application of 2.725 g a.i./ha per year | 2.1                        | 2.1                 | 0.042                        | 0.0086              | 0.0068               |

<sup>&</sup>lt;sup>1</sup> 90<sup>th</sup> percentile of daily concentrations

# 3.5.2 Residues in plant and animal foodstuffs

The residue definition for enforcement in plant products, and enforcement and dietary exposure in animal commodities, is picarbutrazox. The residue definition in plant products for dietary exposure is picarbutrazox and the metabolite TZ-1E. Plant enforcement method, AOAC Official Method 2007.1, and plant and animal enforcement method, OuEChERS-multi residue method, are valid for the quantitation of picarbutrazox residues in crop and animal matrices. Residues of picarbutrazox and the metabolites TZ-1E, TZ-2-B-Glc, TZ-5 and TZ-5-Glc are stable when stored frozen at ≤-18°C in matrices from five crop categories, corn grain and radish (high-starch commodities), leaf lettuce (high-water commodity), dry pinto beans (high-protein commodity), oranges (high-acid commodity), canola seed (high-oil commodity) and wheat straw, for up to 13.4 months. Therefore, residues of picarbutrazox and the metabolites TZ-1E, TZ-2-β-Glc, TZ-5 and TZ-5-Glc are considered stable in all frozen crop matrices and processed crop fractions for up to 13.4 months. Residues of the tetrazole-derived metabolites TT-3 and TT-1 are stable when stored frozen at <-18°C in radish root and wheat grain (high-starch commodities), lettuce and radish tops (high-water commodities) and barley straw only, for up to 12 months. The raw agricultural commodities soybean seed and field corn grain were processed, but were not further analyzed due to the lack of quantifiable residues. Quantifiable residues are not expected to occur in animal matrices with the current use pattern. Crop field trials conducted throughout Canada and the United States using end-use products containing picarbutrazox at slightly exaggerated rates in or on soybean seed and corn (field, sweet and pop) seed are sufficient to support the proposed maximum residue limits.

<sup>&</sup>lt;sup>2</sup> 90<sup>th</sup> percentile of 365-day moving average concentrations

<sup>&</sup>lt;sup>3</sup> 90<sup>th</sup> percentile of the highest 1-day average concentration from each year

<sup>&</sup>lt;sup>4</sup> 90<sup>th</sup> percentile of yearly average concentrations

<sup>&</sup>lt;sup>5</sup> Average of all yearly average concentrations

#### 3.5.3 Dietary risk assessment

Chronic dietary exposure assessments were conducted using the Dietary Exposure Evaluation Model (DEEM–FCID<sup>TM</sup>, Version 4.02, 05-10-c), which incorporates consumption data from the National Health and Nutrition Examination Survey/What We Eat in America (NHANES/WWEIA) for the years 2005-2010.

#### 3.5.3.1 Acute dietary exposure results and characterization

No appropriate toxicological reference value attributable to a single dose for the general population (including children and infants) was identified.

#### 3.5.3.2 Chronic dietary exposure results and characterization

The following criteria were applied to the basic chronic (non-cancer and cancer) analysis for picarbutrazox: 100% crop treated, default processing factors (where available), and the proposed Canadian MRLs for all soybean, corn and animal commodities. The basic chronic dietary exposure from all supported picarbutrazox food uses (alone) for the total population, including infants and children, and all representative population subgroups is less than 3% of the ADI. Aggregate exposure from food and drinking water is considered acceptable. The PMRA estimates that chronic dietary exposure to picarbutrazox from food and drinking water is 0.8% (0.000153 mg/kg bw/day) of the ADI for the total population. The highest exposure and risk estimate is for children 1–2 years of age at 3% (0.000595 mg/kg bw/day) of the ADI.

#### 3.5.4 Maximum residue limits

Table 3.5.4.1 Recommended maximum residue limits

| Commodity  | Recommended<br>MRL (ppm) |
|--|--------------------------|
| Dry soybeans; eggs; fat, meat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep; field corn; milk; popcorn grain; sweet corn kernels plus cob with husks removed | 0.01                     |

For additional information on MRLs in terms of the international situation and trade implications, refer to Appendix II.

The nature of the residues in animal and plant matrices, analytical methodologies, field trial data, and chronic dietary risk estimates are summarized in Appendix I, Tables 1b, 8 and 9.

#### 3.6 Aggregate assessment

Aggregate exposure is the total exposure to a single pesticide that may occur from dietary (food and drinking water), residential and other non-occupational sources, and from all known or plausible exposure routes (oral, dermal and inhalation). An endpoint of concern attributable to a single exposure was not identified in the oral toxicity studies; therefore, an acute oral aggregate risk assessment is not required. The most relevant toxicology endpoint and assessment factor for the chronic oral aggregate exposure is the same as that selected for the ADI (see Section 3.2.2). Since residential exposure is not expected for picarbutrazox, the aggregate assessment consisted of combining food and drinking water exposure only, which was shown to be acceptable see Section 3.5.3.2).

#### 3.7 Cumulative assessment

The *Pest Control Products Act* requires that the PMRA consider the cumulative exposure to pesticides with a common mechanism of toxicity. Accordingly, an assessment of a potential common mechanism of toxicity with other pesticides was undertaken for picarbutrazox. Based on its chemical structure, picarbutrazox has been classified into the Fungicide Resistance Action Committee's Group U17: Tetrazolyloximes. Currently, picarbutrazox is the only member of that class. Outside of the liver and thyroid toxicity linked to hepatic drug-metabolizing enzyme induction, there is no known mammalian toxicity MOA. Overall, for the current evaluation, the PMRA did not identify information indicating that picarbutrazox shares a common mechanism of toxicity with other pest control products. Therefore, no cumulative health risk assessment is required at this time.

#### 3.8 Health incident reports

Picarbutrazox is pending registration for use in Canada, and there are no incident reports in the PMRA database at this time.

# 4.0 Impact on the environment

#### 4.1 Fate and behaviour in the environment

Environmental fate properties of picarbutrazox and its transformation products are summarized in Appendix I, Table 10 and 11.

**Terrestrial environment:** In the terrestrial environment, picarbutrazox is moderately persistent in soil. In aerobic, anaerobic and irradiated laboratory soil studies, TZ-1E, the E-isomer of picarbutrazox, TZ-2, TZ-5 and TT-3 were observed as major transformation products in one or more of the studies. TZ-1E was only observed in the soil phototransformation study. Based on the structural similarity of TZ-1E to picarbutrazox and the results of ecotoxicity studies conducted with TZ-1E, this transformation product was considered toxicologically equivalent to picarbutrazox and was included in the environment modelling residue definition and, therefore, was included in degradation kinetics and carry-over calculations resulting in combined residue

fate parameters. Given that TZ-1E is not produced under non-irradiated laboratory conditions, under those conditions, it was not included in the calculation of fate parameters. Hydrolysis and aerobic biotransformation are anticipated to be the two most significant routes of dissipation (combined residue representative half-lives of 21.1 (pH 7) and 52.2 days, respectively). Phototransformation and anaerobic biotransformation are anticipated to contribute to a lesser degree (half-lives of 89 and 101.5 days, respectively) (Appendix I, Table 11).

Observations from the terrestrial field dissipation study indicated that the combined residue is moderately persistent under field conditions on bare ground plots (DT<sub>50</sub> range: 55.6 to 105 days) and persistent under field conditions on turfgrass plots (DT<sub>50</sub> range: 238 to 360 days). The dissipation times suggest that the combined residue may be persistent under field conditions and have the potential to be carried over to the following growing season. However, maximum carry over of the combined residue observed during field trials on bare ground and turf grass were 14.2 and 16.8% AR, respectively, and ranged between 3.8% and 16.8% for all sites in Canadian relevant eco-regions. As such, picarbutrazox is not anticipated to carry-over under field conditions.

Laboratory experiments show that picarbutrazox is immobile in most soils but may demonstrate low mobility in soils with low organic carbon content (K<sub>oc</sub> values ranged between 1530 and 5849 L/kg). Observations from field dissipation studies indicate that picarbutrazox was confined to the top 30 cm layer. Considering all the information available in a leaching assessment, the PMRA concludes that picarburazox is not likely to reach groundwater. Based on the structural similarity of TZ-1E to picarbutrazox, this transformation product was considered to have the same  $K_{oc}$ range and mobility as picarbutrazox. Laboratory experiments conducted with TZ-2 show that this transformation product is more mobile than picarbutrazox ( $K_{oc}$  ranged from 426.7 to 5359 L/g). Observations from field dissipation studies however indicate that TZ-2 was also confined to the top 30 cm layer. Considering all the information available in a leaching assessment, the PMRA concludes that TZ-2 is not likely to reach groundwater. Fewer data were available to assess the leaching potential of the remaining major transformation products.  $K_{oc}$  values for these transformation products were estimated using Episuite software which suggest that the major soil transformation products TZ-5 and TT-3 may have high mobility in soil and therefore the potential to leach to groundwater. As a result, precautionary label statements will be required to inform users of the leaching potential.

**Aquatic environment:** In the aquatic environment, picarbutrazox is slightly persistent to moderately persistent. Laboratory studies show that hydrolysis, phototransformation and aerobic/anaerobic biotransformation contribute to the overall dissipation (Appendix I, Table 11). In laboratory studies, TZ-1E, TZ-2, TZ-3E, TZ-4, TZ-4-1, TZ-5, TY-2, TY-3, TY-4, TY-5, TY-6, TY-8, TY-9 (pH 9 only), TT-1 and TT-3 were observed as major transformation products. TZ-1E was only observed in phototransformation studies. Aquatic degradation kinetics were calculated based on the combined residue of picarbutrazox and the transformation product TZ-1E. Hydrolysis half-lives of the combined residue were 4.8, 21.1 and 24.3 days at pH 4, 7 and 9, respectively. Under irradiation, aquatic phototolysis half-lives of the combined residue were 3.0 days in distilled water, 3.8 days in natural water and 1.7 days in pH 9 buffer solution. In aerobic water/sediment systems, picarbutrazox partitioned to the sediment with water layer DT<sub>50</sub>s of 10.5

to 10.9 days. For the total system, the combined residue was slightly to moderately persistent with total system  $DT_{50s}$  of 33.5 to 53.2 days. In anaerobic water/sediment systems, picarbutrazox also partitioned to the sediment with water layer  $DT_{50s}$  of 9.33 to 25.3 days. For the total system, the combined residue was slightly persistent with total system  $DT_{50s}$  of 20.9 to 31.7 days.

**Air:** Picarbutrazox has low solubility in water, low vapour pressure and low Henry's law constant. The intrinsic physico-chemical properties suggest that picarbutrazox is not likely to volatilize from moist soil or water surfaces under field conditions. Picarbutrazox, therefore, has a low potential for transport in the atmosphere.

**Bioaccumulation:** The log  $K_{ow}$  of 3.77 for picarbutrazox suggests a potential for bioaccumulation. However, results from a bioconcentration study conducted with rainbow trout showed a growth corrected, lipid-normalized kinetic bioconcentration factor of 314 for whole fish indicating that the potential for bioaccumulation is low. The depuration half-life of picarbutrazox from rainbow trout was 1.5 days. Picarbutrazox is therefore not expected to bioaccumulate.

#### 4.2 Environmental risk characterization

The environmental risk assessment integrates the environmental exposure and ecotoxicology information to estimate the potential for adverse effects on non-target species. This integration is achieved by comparing EECs with concentrations at which adverse effects occur. The EECs are estimated using standard models which take into consideration the application rate(s), chemical properties and environmental fate properties, including the dissipation of the pesticide between applications. Ecotoxicology information includes acute and chronic toxicity data for various organisms or groups of organisms from both terrestrial and aquatic habitats including invertebrates, vertebrates, and plants. Toxicity endpoints used in risk assessments may be adjusted to account for potential differences in species sensitivity as well as varying protection goals (in other words, protection at the community, population, or individual level). A summary of endpoints for terrestrial and aquatic organisms is presented in Appendix I, Table 12 and 13, respectively.

Initially, a screening level risk assessment is performed to identify pesticides and/or specific uses that do not pose a risk to non-target organisms, and to identify those groups of organisms for which there may be a potential risk. The screening level risk assessment uses simple methods, conservative exposure scenarios (for example, direct application at a maximum cumulative application rate) and the most sensitive toxicity endpoints. A risk quotient (RQ) is calculated by dividing the exposure estimate by an appropriate effects metric, and the risk quotient is then compared to the level of concern (LOC = 1 for most species, 0.4 for acute risk to pollinators, and 2 for beneficial arthropod test species). If the screening level RQ is below the LOC, the risk is considered negligible and no further risk characterization is necessary. If the screening level RQ is equal to or greater than the LOC, further characterization of the risk is conducted by taking into consideration more realistic exposure scenarios and effects metrics. These consideration may include additional exposure modelling, monitoring data, results from field or mesocosm studies, and probabilistic risk assessment methods.

The potential risk from the use of VAYANTIS Seed Treatment was assessed at the following application rates:

• Seed treatment: maximum seed treatment rate of 5.0 g a.i./100 kg seed for corn and 2.5 g a.i./100 kg seed for soybean. For non-target terrestrial and aquatic organisms, the most conservative EECs were determined based on the soybean rate which corresponds to 2.725g a.i./ha based on the planting of soybean seed. For birds and mammals, the highest exposure estimates resulted from the corn seed application rate.

The screening level risk assessment and further characterization of risk for picarbutrazox, its end-use product and transformation products are summarized in Appendix I, Table 15, Table 16, and Table 17 for seed treatment application.

#### 4.2.1 Risks to terrestrial organisms

For the acute exposure risk assessment for terrestrial organisms, effects metrics used when calculating RQs include an uncertainty factor of 1/2 for terrestrial invertebrates and 1/10 for birds and mammals applied to an EC<sub>50</sub> or LC<sub>50</sub> and compared to an LOC of 1. For pollinators, the effects metric does not include an uncertainty factor and is compared to an LOC of 0.4. For the chronic exposure risk assessment, the effects metrics do not include an uncertainty factor. A summary of available terrestrial toxicity data for picarbutrazox, its formulated end-use product and its transformation products is presented in Appendix I, Table 12 Picarbutrazox is classified as practically nontoxic to bees, birds and mammals.

A summary of the effects metrics used in the risk assessment is presented in Appendix I, Table 14 The screening level risk assessment for picarbutrazox is presented in Appendix I, Table 15 and Table 16 for seed treatment.

In summary, when used according to the proposed label directions, risks associated with the use of picarbutrazox as a seed treatment are acceptable for the following terrestrial organisms:

- Earthworms
- Beneficial arthropods
- Pollinators
- Birds and mammals
- Terrestrial plants

#### **Earthworms**

Earthworms may be exposed to picarbutrazox through contact of residues in soil. The soil EEC of 0.0012 mg a.i./kg soil was calculated based on the proposed seed treatment rate of 2.5 g a.i./100 kg seed for soybean seed, a seeding rate of 109 kg soybean seed/ha and accounting for soil degradation using the 90<sup>th</sup> upper percentile on the mean of the aerobic soil representative half-lives of 64 days. This concentration was calculated assuming that the product is evenly distributed in the top 0 to 15 cm depth of soil with a bulk density of 1.5 g/cm<sup>3</sup>. EECs for

transformation products were calculated conservatively assuming that 100% of the applied picarbutrazox active ingredient was instantly transformed into the transformation product on a molecular weight/weight basis. Mortality and reproductive effects of picarbutrazox, TZ-1E, TZ-2 and TZ-5 on earthworms were determined in laboratory soil studies and the results were compared to the screening level soil EEC. The resulting RQ did not exceed the LOC, therefore, risks to earthworms from picarbutrazox and its transformation products TZ-1E, TZ-2 and TZ-5 are acceptable when label directions are followed.

#### Beneficial predatory and parasitic arthropods

Picarbutrazox is not expected to be present on plant and soil surfaces when used as a seed treatment, as such, exposure of surface dwelling beneficial arthropods to picarbutrazox is not anticipated from the proposed use pattern. The risks to surface dwelling beneficial arthropods from the use of picarbutrazox as a seed treatment are therefore acceptable when label directions are followed

Soil dwelling predatory mites may be exposed to residues of picarbutrazox in soil resulting from treated seed. The soil EEC of 0.0012 mg a.i./kg soil for picarbutrazox, as described under the earthworm section, was used to assess risk to soil dwelling predatory mites. The reproductive effects of picarbutrazox, TZ-1E, TZ-2 and TZ-5 on the soil dwelling predatory mite, *Hypoaspis geolaelaps aculeifer*, were determined in laboratory soil studies and the results were compared to the screening level soil EEC of 0.0012 mg a.i./kg soil. The resulting RQs did not exceed the LOC. The chronic reproductive risks to soil dwelling beneficial predatory arthropods from the use of picarbutrazox as a seed treatment are acceptable when label directions are followed.

#### **Pollinators**

The primary route of exposure for pollinators from seed treatment products is through the diet via systemic transport of pesticide residues (including picarbutrazox and transformation products) from the seed into the pollen and nectar of the plant. Minimal systemic transport of picarbutrazox residues through the plant from treated seed is anticipated, therefore, exposure of pollinators is expected to be minimal. Pollinators can be exposed to pesticide residues in dust generated during the planting of treated seeds. Dust reduction best management practices and awareness is likely to reduce this exposure route. In addition, picarbutrazox is practically nontoxic to pollinators. When considering all the evidence, the acute and chronic risks to adult honeybees and honeybee larva from the use of picarbutrazox as a seed treatment are acceptable when label directions are followed.

#### Birds and mammals

Birds and mammals may be exposed to picarbutrazox residues by the consumption of treated seed. Screening level estimated daily exposures (EDEs) were calculated based on the proposed seed treatment rate of 5.0 g a.i./100 kg seed for corn seed and a seeding rate of 31.5 kg corn seed/ha. Corn seed was selected for the screening level risk assessment as treated corn seed resulted in higher exposure values to birds and mammals than treated soybean seed.

The EDE is calculated as follows

(FIR/BW) × EEC, where: FIR = Food Ingestion Rate and BW = Body weight

The screening level EDEs and RQ calculations for birds and mammals are presented in Appendix I, Table 16.

The RQs for birds and mammals resulting from both acute oral exposure and reproductive exposure did not exceed the LOC at the screening level. The risks to birds and mammals from the use of picarbutrazox as a seed treatment are acceptable when label directions are followed.

# Non-target terrestrial plants

Non-target terrestrial plants are not anticipated to be exposed to picarbutrazox from the planting of treated seed. The risks to non-target terrestrial plants from the use of picarbutrazox as a seed treatment are acceptable when label directions are followed.

#### 4.2.2 Risks to aquatic organisms

A risk assessment of picarbutrazox, the transformation products, TZ-1E, TZ-2, TZ-4, TZ-5, TY-3 and the end-use product VAYANTIS seed treatment was conducted for freshwater and marine aquatic organisms based on available toxicity data.

Table For the acute exposure risk assessment, effects metrics used when calculating RQs include an uncertainty factor of 1/2 for aquatic plants and invertebrates and 1/10 for fish and amphibians applied to an EC<sub>50</sub> or LC<sub>50</sub>. For the chronic exposure risk assessment, the effects metrics do not include an uncertainty factor. A summary of aquatic toxicity data for picarbutrazox, its formulated end-use product and its transformation products is presented in Appendix I, Table 13 Picarbutrazox is classified as highly toxic to freshwater invertebrates, freshwater fish, marine invertebrates and marine fish. Label statements are required to inform users of the potential toxicity to aquatic organisms.

A summary of the effects metrics used in the risk assessment are presented in Appendix I, Table 14. A summary of the results of the aquatic risk assessment are presented in Appendix I, Table 17.

The screening level risk from the use of picarbutrazox as a seed treatment was assessed based upon the maximum seed treatment rate of 2.5 g a.i./100 kg seed for soybean and a seeding rate of 109 kg soybean seed/ha. The maximum corresponding rate of active ingredient per hectare was determined to be 2.725g a.i./ha. The resulting EECs were calculated assuming that 100% of the active ingredient was instantaneously and completely introduced and mixed within the water body.

In summary, when used according to the proposed label directions, risks associated with picarbutrazox are acceptable for the following aquatic organisms:

- Freshwater vascular plants and algae, and marine algae
- Freshwater and marine invertebrates
- Freshwater and marine fish
- Amphibians

#### 4.3 Environmental incident reports

Picarbutrazox is pending registration for use in Canada, and there are no incident reports in the PMRA database at this time.

#### 5.0 Value

The registration of VAYANTIS Seed Treatment will provide Canadian growers with a unique fungicide mode of action to manage important diseases in corn and soybean while mitigating the risk of resistance development by causal pathogens to other fungicides that are registered to control the same diseases.

The efficacy of VAYANTIS Seed Treatment for control of seed rot/pre-emergence damping-off and post-emergence damping-off was assessed at multiple rates in 14 field and controlled environment studies conducted on field corn. Data for stand counts (number of plants/area) demonstrated that VAYANTIS Seed Treatment applied at 2.5–12.5 mL/100 kg seed can be expected to protect corn seed and seedlings from seed rot/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. It was determined that application of the lowest rate was most appropriate for fields with historically low levels of pre-emergence damping-off while 6.25 mL/100 kg seed rate was more effective on fields with known higher levels of damping-off. It was also demonstrated that VAYANTIS Seed Treatment applied at 12.5 mL/100 kg seed may improve stand count to a greater extent than lower rates under conditions favouring the development of post-emergence damping-off.

The efficacy of VAYANTIS Seed Treatment for control of seed rot/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. was assessed in three field and two controlled environment studies conducted on soybean. Stand count data demonstrated that VAYANTIS Seed Treatment applied at 2.5 to 6.25 mL/100 kg seed protected soybean seed rot/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. The higher rate is most appropriate for fields with historically higher levels of damping-off.

VAYANTIS Seed Treatment did not cause injury to either corn or soybean.

The data collectively support the efficacy claims summarized in Appendix I, Table 21 for VAYANTIS Seed Treatment.

#### 6.0 Pest control product policy considerations

#### 6.1 Assessment of the active ingredient under the toxic substances management policy

The Toxic Substances Management Policy (TSMP) is a federal government policy developed to provide direction on the management of substances of concern that are released into the environment. The TSMP calls for the virtual elimination of Track 1 substances, in other words, those that meet all four criteria outlined in the policy: persistent (in air, soil, water and/or sediment), bio-accumulative, primarily a result of human activity and toxic as defined by the Canadian Environmental Protection Act. The Pest Control Products Act requires that the TSMP be given effect in evaluating the risks of a product.

During the review process, picarbutrazox and its transformation products were assessed in accordance with the PMRA Regulatory Directive DIR99-03<sup>5</sup> and evaluated against the Track 1 criteria. The PMRA has reached the conclusion that picarbutrazox and its transformation products do not meet all of the TSMP Track 1 criteria. Please refer to Appendix I, Table 20 for further information on the TSMP assessment.

#### 6.2 Formulants and contaminants of health or environmental concern

During the review process, contaminants in the active ingredient as well as formulants and contaminants in the end-use products are compared against Parts 1 and 3 of the List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern. <sup>6</sup> The list is used as described in the PMRA Notice of Intent NOI2005-01<sup>7</sup> and is based on existing policies and regulations, including the Toxic Substances Management Policy<sup>1</sup> and Formulants Policy,<sup>8</sup> and taking into consideration the Ozone-depleting Substance Regulations, 1998, of the Canadian Environmental Protection Act (substances designated under the Montreal Protocol).

DIR99-03, The Pest Management Regulatory Agency's Strategy for Implementing the Toxic Substances Management Policy

SI/2005-114, last amended on June 25, 2008. See Justice Laws website, Consolidated Regulations, List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern

PMRA's Notice of Intent NOI2005-01, List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern under the New Pest Control Products Act

DIR2006-02, Formulants Policy and Implementation Guidance Document

# 7.0 Proposed regulatory decision

Health Canada's PMRA, under the authority of the *Pest Control Products Act*, is proposing registration for the sale and use of Picarbutrazox Technical and VAYANTIS Seed Treatment, containing the technical grade active ingredient picarbutrazox, to control seed rot/pre-emergence damping-off and post-emergence damping-off in corn and soybean.

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable.

# Additional information being requested

Since this technical product is manufactured only at pilot scale before registration, five-batch data representing commercial-scale production will be required as post-market information after registration.

#### List of abbreviations

↑ increased
↓ decreased
♂ male
♀ female

μg microgram(s) μm Micrometer

1/n exponent for the Freundlich isotherm

a.i. active ingredient

abs absolute

ADI administered dose ADI acceptable daily intake A:G albumin/globulin ratio

AHETF Agricultural Handler Exposure Task Force

ALP alkaline phosphatase ALT alanine aminotransferase

APTT activated partial thromboplastin time

ARfD acute reference dose

AST aspartate aminotransferase

atm atmosphere

BAF Bioaccumulation Factor BCF Bioconcentration Factor

bw body weight bwg body weight gain

CAF composite assessment factor CAS Chemical Abstracts Service

cm centimetres

CR chemical-resistant DF dry flowable

DNA deoxyribonucleic acid

DT<sub>50</sub> dissipation time 50% (the dose required to observe a 50% decline in

concentration)

DT<sub>90</sub> dissipation time 90% (the dose required to observe a 90% decline in

concentration)

dw Dry weight

 $EC_{25}$  effective concentration on 25% of the population  $EC_{50}$  effective concentration on 50% of the population

EDE Estimated Daily Exposure

EEC Estimated Environmental Concentration ER<sub>25</sub> effective rate for 25% of the population

F1 first generation
F2 second generation
fc food consumption
fe food efficiency
FIR Food ingestion rate

FOB functional observational battery

FRAC Fungicide Resistance Action Committee

g gram(s) GD gestation day

GGT gamma-glutamyl transpeptidase

GLP good laboratory practices ha hectare(s)

HDT highest dose tested

HDPE high-density polyethylene

Hg mercury

HPLC high performance liquid chromatography

ICE isolated chicken eye

IUPAC International Union of Pure and Applied Chemistry

kg kilogram(s)

 $K_{\rm d}$  soil-water partition coefficient  $K_{\rm F}$  Freundlich adsorption coefficient

km kilometre

 $K_{\text{oc}}$  organic-carbon partition coefficient  $K_{\text{ow}}$  n—octanol-water partition coefficient

L litre(s)

LC<sub>50</sub> lethal concentration 50%

LD<sub>50</sub> lethal dose 50%

LOAEC lowest observed adverse effect concentration

LOAEL lowest observed adverse effect level LOEC low observed effect concentration

LOQ limit of quantitation
LR<sub>50</sub> lethal rate 50%
mg milligram(s)
mL millilitre(s)

maximum average score MAS MIS maximum irritation score mixing and loading M/LMOA mode of action MOE margin of exposure maximum residue limit **MRL** MS mass spectrometry N/A not applicable number No

NOAEC no observed adverse effect concentration

NOAEL no observed adverse effect level NOEC no observed effect concentration

NOEL no observed effect level NOER no observed effect rate

N/R not required

NZW New Zealand white OC organic carbon content

OM organic matter content
P parental generation
PBI plantback interval
PHI preharvest interval
dissociation constant

PMRA Pest Management Regulatory Agency

PPE personal protective equipment

ppm parts per million

rel. relative

RSD relative standard deviation

S9 mammalian metabolic activation system

SC soluble concentrate

 $t_{1/2}$  half-life

T3 tri-iodothyronine

T4 thyroxine

TP Transformation product TRR total radioactive residue

TSMP Toxic Substances Management Policy

TSH thyroid stimulating hormone UAN urea ammonium nitrate

UDP-GT uridine diphosphate glucuronyltransferase

UF uncertainty factor

UV ultraviolet

v/v volume per volume dilution

wt weight

# **Appendix I Tables and figures**

Table 1a Residue analysis in environmental media

| Matrix                            | Method type | Analyte                | LOQ         | Reference  |
|-----------------------------------|-------------|------------------------|-------------|--|
| Fish – edible and inedible tissue | HPLC-MS/MS  | Parent, TZ-1E,<br>TZ-2 | 0.024 mg/kg | PMRA# 2809362,<br>2809363  |
| Soil                              | HPLC-MS/MS  | Parent, TZ-1E,<br>TZ-2 | 0.01 mg/kg  | PMR # 2809344,<br>2809345  |
| Sediment – artificial and natural | HPLC-MS/MS  | Parent                 | 0.05 mg/kg  | PMRA# 2809346,<br>2809347  |
| Water – surface                   | HPLC-MS/MS  | Parent, TZ-1E          | 0.05 μg/L   | PMRA# 2809358,<br>2809359, 2809360,<br>2809361   |
|                                   | HPLC-MS/MS  | TZ-2                   | 0.1 μg/L    | PMRA# 2809358,<br>2809359, 2809360,<br>2809361   |
| Water – fresh (well)              | HPLC-MS/MS  | Parent, TZ-1E          | 15 μg/L     | PMRA# 2809502,<br>2809503  |
| Water – salt                      | HPLC-MS/MS  | Parent, TZ-1E          | 15 μg/L     | PMRA# 2809502,<br>2809503  |
| Water – laboratory<br>well water  | HPLC-MS/MS  | TZ-2, TZ-4, TY-3, TZ-5 | 0.1 μg/L    | PMRA# 2809474,<br>2809475, 2809476,<br>2809477, 2809478,<br>2809479, 2809480,<br>2809481 |
| Water – fortified<br>well water   | HPLC-MS/MS  | TZ-2, TZ-4, TY-3, TZ-5 | 0.1 μg/L    | PMRA# 2809474,<br>2809475, 2809476,<br>2809477, 2809478,<br>2809479, 2809480,<br>2809481 |
| Water – algal assay<br>medium     | HPLC-MS/MS  | TZ-2, TZ-4, TY-3, TZ-5 | 0.1 μg/L    | PMRA# 2809474,<br>2809475, 2809476,<br>2809477, 2809478,<br>2809479, 2809480,<br>2809481 |

Table 1b Residue analysis in plant and animal matrices

| Analytical methods              | Matrix  | Analytes  | Method ID/<br>type  | LOQ   | Reference        |
|---------------------------------|---|---|---|---|------------------|
| Animal commod                   | lities  |   |   |   |                  |
| ILV of<br>Enforcement<br>Method | Milk, egg,<br>and bovine<br>meat and<br>liver   | Picarbutrazox   | QuEChERS-<br>multiresidue<br>method                           | 0.01 ppm  | PMRA#<br>2935712 |
| Radiovalidation                 | Radiovalidation data were not provided. QuEChERS-multiresidue method uses similar extraction solvents (acetonitrile based) as those used in the livestock metabolism studies. In the metabolism studies, the majority of the radioactive residues in poultry liver, eggs, goat muscle, fat, kidney, liver and milk demonstrated good extractability (>72%). Therefore, radiovalidation data are not required. |   |   |   |                  |
| Plant commodit                  | ies   |   |   |   |                  |
| Enforcement<br>Method           | Cucumber, orange, canola, corn grain, dry beans and wheat straw  Cucumber, orange and   | Picarbutrazox<br>and<br>metabolites<br>TZ-1E and<br>TZ-5                            | AOAC Official Method 2007.1/ LC-MS/MS  QuEChERS- multiresidue | 0.005 ppm per analyte, all matrices  0.005 ppm per analyte, all | PMRA#<br>2808240 |
|                                 | orange and corn grain   |   | method/<br>LC-MS/MS   | matrices  |                  |
| Data-Gathering<br>Method        | Cucumber,<br>corn grain,<br>wheat straw,<br>canola seed,<br>radish root,<br>dry pinto<br>beans and<br>orange fruit.   | Picarbutrazox<br>and<br>metabolites<br>TZ-1E, TZ-2-<br>β-Glc, TZ-5,<br>and TZ-5-Glc | Method<br>83966/<br>LC-MS/MS                                  | 0.005 ppm per<br>analyte, all<br>matrices                       | PMRA#<br>2808238 |

| Analytical methods              | Matrix  | Analytes   | Method ID/<br>type   | LOQ                                       | Reference        |
|---------------------------------|---|--|--|---|------------------|
| ILV of<br>Enforcement<br>Method | Cucumber, orange, canola, corn grain, dry beans and wheat straw  Cucumber, orange and corn grain  | Picarbutrazox<br>and<br>metabolites<br>TZ-1E and<br>TZ-5 | AOAC Official Method 2007.1/ LC-MS/MS  QuEChERS- multiresidue method/ LC-MS/MS | 0.005 ppm per<br>analyte, all<br>matrices | PMRA#<br>2808244 |
| Radiovalidation                 | Residues of picarbutrazox and the metabolites in metabolism studies, analytical method 83966 and QuEChERS-multiresidue method were extracted using acetonitrile. AOAC Official Method 2007.1 also uses extraction solvents acetonitrile + 1% acetic acid. Extraction efficiencies from all crop matrices (lettuce, cucumber, corn forage), all labels (PH, PY and TTZ) in the metabolism studies were >80%. Therefore, radiovalidation data are not required. |  |  |   |                  |

Table 2 Identification of select isomers and metabolites of picarbutrazox

| Code        | Chemical name  |
|-------------|--|
| TZ-1E       | $tert$ -butyl (6-{[( $E$ )-(1-methyl-1 $H$ -5-tetrazolyl)(phenyl)methylene]- |
|             | aminooxymethyl}-2-pyridyl)carbamate  |
| TZ-2        | (Z)- $O$ -[(6-amino-2-pyridyl)methyl](1-methyl-1 $H$ -5-                     |
|             | tetrazolyl)(phenyl)methanone oxime   |
| TZ-2E       | (E)- $O$ -[(6-amino-2-pyridyl)methyl](1-methyl-1 $H$ -5-                     |
|             | tetrazolyl)(phenyl)methanone oxime   |
| TY-2        | (6-amino-2-pyridyl)methanol  |
| TZ-4        | (1-methyl-1 <i>H</i> -5-tetrazolyl)(phenyl)methanone                         |
| TZ-5        | (1-methyl-1 <i>H</i> -5-tetrazolyl)(phenyl)methanol                          |
| TT-3K       | Potassium 1-methyl-1- <i>H</i> -tetrazole-5-carboxylate                      |
| BPOH-NF-171 | $tert$ -butyl $\{6-[(6-\{[(Z)-(1-methyl-1H-5-tetrazolyl)\}$                  |
|             | (phenyl)methylene]amino oxy}methyl-2-pyridyl) carbamoyloxy]methyl-           |
|             | 2-pyridyl}carbamate  |
| Me-NF-171   | methyl N- $[(6-\{[(Z)-(1-methyl-1H-5-tetrazolyl) (phenyl)methylene]amino$    |
|             | oxymethyl}-2-pyridyl)] carbamate   |

# Table 3 Toxicity profile of technical picarbutrazox

Effects observed in both sexes are presented first followed by sex-specific effects in males, then females, each separated by semi-colons. Organ weight effects reflect both absolute organ weights and relative organ to body weights unless otherwise noted. Effects seen above the LOAEL(s) have not been reported in this table for most studies for reasons of brevity.

| Study<br>type/animal/PMRA#  | Study results   |
|---|---|
| <b>Toxicokinetic studies</b>  |   |
| Absorption, distribution, toxicokinetics, metabolism and excretion study following single gavage doses (low and high) | Absorption, distribution, metabolism and excretion were investigated with [phenyl-U- <sup>14</sup> C] labelled picarbutrazox. Single doses were administered by gavage at 1 or 100 mg/kg bw. Some rats were bile duct-cannulated to assess biliary excretion.   |
| Sprague-Dawley rats PMRA# 2809304   | <b>Absorption:</b> Absorption was higher at 1 mg/kg bw than at 100 mg/kg bw and bile was an important route of excretion. The total absorbed radiolabel was 86–91% of the administered dose (AD) at 1 mg/kg bw and 15–25% of the AD at 100 mg/kg bw.  |
|   | <b>Excretion:</b> Most of the radioactivity (>90%) was eliminated in urine and feces within 48 hours post-dosing. Excretion was mainly via the feces. Urinary excretion was slightly higher at 1 mg/kg bw than at 100 mg/kg bw. At 96 hours, urinary excretion in the 1 mg/kg bw group accounted for 11% and 9% of the AD and fecal excretion accounted for 82% and 84% of the AD in males and females, respectively. Recovered radiolabel in bile accounted for 77–80% of the AD for low dose and 14–23% of the AD for high dose. Overall excretion of radioactivity was rapid with >90% of the AD excreted during the first 48 hours for both sexes and both dose levels. |
|   | Kinetic Parameters: Plasma and whole-blood sampling of animals showed the rate and extent of systemic exposure at 100 mg/kg bw increased in comparison to the 1 mg/kg bw group, but in a less than dose-proportionate manner consistent with the observed differences in absorption between dose levels. The whole blood to plasma ratios suggested a relatively even distribution of radioactivity between plasma and red blood cells.   |
|   | <b>Distribution:</b> In general, concentrations of radioactivity in the tissues were similar in males and females. Concentrations of radioactivity in tissues were highest in the liver for both sexes and dose levels. Overall, tissue retention was low with low or no detectable levels of the radioactivity retained in tissues at 96 hours post-dosing (<1% of the AD). In the 1 mg/kg bw group, peak  |

| Study<br>type/animal/PMRA#   | Study results  |
|--|--|
|  | tissue concentrations generally occurred at 2 hours post-dosing and were higher in females than males. At 6 hours, tissue concentrations had generally declined, but were higher for males than females in the majority of tissues. At 2 hours, the highest concentrations of radioactivity (excluding gastrointestinal tract) were in the liver. At 6 hours in the 100 mg/kg bw group, the highest concentrations of radioactivity were in the liver, prostate, fat, and adrenal glands. Concentrations of radioactivity in tissues declined over time.   |
| Study<br>type/animal/PMRA#   | Study results  |
|  | Metabolites: There were no major sex differences in the profile of radioactive components. Unchanged picarbutrazox accounted for a maximum of 78.3% of the 100 mg/kg bw dose (in the feces). Other components detected in the feces were TZ-7-3 (maximum of 25.4% of the AD), TZ-7 (maximum of 6.2% of the AD) and TZ-8-3/TZ-1-23 (maximum of 12.9% of the AD). Minor metabolites TZ-9 and TZ-2-3 accounted for no greater than 6.0% of the AD. The major metabolite in bile (maximum of 38.1% of the AD) was identified as an unstable glucuronide conjugate of TZ-7-3. One other major component was seen at a maximum of 10.4% of the AD in bile of females at the low dose level and was identified as an unstable conjugate of TZ-8-3/TZ-1-23 (intramolecular ester transition of TZ-1-23 to TZ-8-3 occurs readily). All other metabolites detected in bile accounted for no greater than 7.1% of the AD. In urine, the highest concentration metabolite was a glucuronide conjugate of TZ-3 (maximum of 5.2% of the AD). No other metabolite in urine accounted for greater than 5% of the dose. Unchanged picarbutrazox was not detected in urine or bile. The following compounds were identified: TZ-1-2, TZ-2-3, TZ-7, TZ-7-3, TZ-8-3/TZ-1-23, TZ-9 and TZ-3.  At 2 hours after a single dose at 1 mg/kg bw, the major metabolites identified in plasma were TZ-7 and TZ-8-3/TZ-1-23. Most of the metabolites of picarbutrazox identified in excreta were also |
| Absorption, distribution,  | detected in tissues.  Absorption, distribution, metabolism and excretion were  |
| toxicokinetics, metabolism<br>and excretion study<br>following single gavage | investigated with [pyridine-4- <sup>14</sup> C] labelled picarbutrazox. A single oral dose of 1 mg/kg bw was administered by gavage.   |
| doses (low) Sprague-Dawley rats  | <b>Absorption and Excretion:</b> Most of the radioactivity (>90% of the AD) was eliminated in urine (9-12% of the AD) and feces (86–82% of the AD) within 48 hours post-dosing. Excretion was mainly via the feces. Total recovery was 96 and 95% of the AD for  |

| Study                  | Study results  |
|------------------------|--|
| type/animal/PMRA#      | Study results  |
| PMRA# 2809311          | male and female groups, respectively.  |
|                        | <b>Kinetic Parameters:</b> Plasma and whole-blood sampling of animals showed that the rate and extent of exposure was higher in females than in males. The whole blood to plasma ratios indicated similar concentrations of radioactivity in plasma and red blood cells.   |
|                        | <b>Distribution:</b> In general, concentrations of radioactivity in tissues were similar in males and females. Concentrations of radioactivity in tissues were highest in the liver for both sexes. Overall tissue retention after single oral doses was low, with low or no detectable levels of the radioactivity retained in tissues at 96 hours postdosing (<1% of the AD).  |
|                        | Metabolites: There were no major sex differences in the profile of radioactive components. Unchanged picarbutrazox accounted for a maximum of 3.9% of the AD (in feces). Metabolites detected in the feces were TZ-7-3 (maximum of 25.3% of the AD), TZ-8-3 (maximum of 7.8% of the AD), TZ-2-3 (maximum of 2.2% of the AD), TZ-1-23 (maximum of 4.5% of the AD), TZ-7 (maximum of 4.9% of the AD), and TZ-9 (maximum of 4.4% of the AD) were also detected. In urine, the primary metabolite was TY-7 (maximum of 4.3% of the AD). No other metabolite in urine accounted for greater than 3% of the AD. Unchanged picarbutrazox was not detected in urine. Unidentified compounds represented approximately 6% and 21% of the AD in urine and feces, respectively. Metabolites identified were: TZ-2-3, TZ-7, TZ-7-3, TZ-1-23, TZ-8-3, TZ-9 in the feces and TZ-7-3, TZ-9 and TY-7 in the urine. |
| Acute toxicity studies | / III the time.  |
| Acute Oral Toxicity    | $LD_{50} > 2000 \text{ mg/kg bw } (\Im/\Im)$   |
| (gavage)               |  |
| Sprague-Dawley rats    | No clinical signs of toxicity  |
| PMRA# 2809142          | Low acute toxicity   |
| Acute Dermal Toxicity  | $LD_{50} > 2000 \text{ mg/kg bw } ( ?/?)$  |
| Sprague-Dawley rats    | No clinical signs of toxicity  |
| PMRA# 2809168          | Low acute toxicity   |

| Study<br>type/animal/PMRA#        | Study results   |
|-----------------------------------|---|
| Acute Inhalation Toxicity         | $LC_{50} > 5.20 \text{ mg/L } (2/2)$  |
| Sprague-Dawley rats               | Clinical signs at 5.20 mg/L included wet fur and test substance staining  |
| PMRA# 2809170                     | Stammig   |
|                                   | Low acute toxicity  |
| Eye Irritation                    | MAS = $0.2/110$ , MIS = $5/110$ at 1 hour   |
| Japanese White rabbits            | Minimally irritating  |
| PMRA# 2809175                     |   |
| Dermal Irritation                 | MAS = 0/8, MIS = 0/8  |
| Japanese White rabbits            | Non-irritating  |
| PMRA# 2809177                     |   |
| Skin Sensitization,               | Negative  |
| Maximization Method               |   |
| Hartley guinea pigs               |   |
| PMRA# 2809179                     |   |
| <b>Short-term toxicity studie</b> | s   |
| 5-Day Inhalation                  | Supplemental – range-finding, non-guideline, non-GLP NOAEC and LOAEC not established  |
| Sprague-Dawley rats               |   |
| PMRA# 2809172                     | Effects at and above 1.00 mg/L (261 mg/kg bw/day): $\uparrow$ liver wt and hepatocellular hypertrophy ( $\circlearrowleft/ \updownarrow$ ); $\uparrow$ thyroid follicular cell hypertrophy ( $\updownarrow$ )   |
|                                   | Effects at 5.2 mg/L (1364 mg/kg bw/day): Exposure-related breathing difficulties, $\uparrow$ thyroid/parathyroid wt, $\uparrow$ epithelial alteration at the tracheal bifurcation ( $\lozenge/\diamondsuit$ ); $\uparrow$ centriacinar foamy alveolar macrophage accumulation ( $\lozenge$ ); $\downarrow$ bw first two days ( $\diamondsuit$ ) |
| 28-Day Oral Toxicity              | Supplemental – range-finding, non-GLP   |
| (diet)                            | NOAEL and LOAEL not established   |
| CD-1 mice                         | Effects at and above 96/125 mg/kg bw/day: $\uparrow$ hepatocellular hypertrophy ( $\circlearrowleft$ / $\circlearrowleft$ ); $\uparrow$ hepatocellular cytoplasmic inclusion bodies,  |
| PMRA# 2809214                     | ↑ hepatocellular vacuolation, ↓ total protein, ↓ albumin and A:G ratio (♂)  |
|                                   | Effects at 1010/1233 mg/kg bw/day: $\uparrow$ ALT ( $\circlearrowleft$ / $\updownarrow$ ); $\uparrow$ liver wt, $\downarrow$  |

| Study                  | Study results   |
|------------------------|---|
| type/animal/PMRA#      | Study Tesuits   |
|                        | bilirubin, $\uparrow$ AST, $\uparrow$ prothrombin time ( $\circlearrowleft$ ); $\downarrow$ rel. kidney wt, $\uparrow$ hepatocellular cytoplasmic inclusion bodies, $\uparrow$ eosinophil count, $\uparrow$ phosphorus ( $\supsetneq$ ) |
| 90-Day Oral Toxicity   | NOAEL not established   |
| (diet)                 | LOAEL = 25/33 mg/kg bw/day $(\Im/\Im)$  |
| CD-1 mice              | Effects at LOAEL: ↑ hepatocellular fatty vacuolation (♂/♀)  |
| PMRA# 2809200          |   |
| 28-Day Oral Toxicity   | NOAEL = $15/16 \text{ mg/kg bw/day } (3/2)$   |
| (diet)                 | LOAEL = $150/163$ mg/kg bw/day ( $\Im$ / $\Im$ )  |
| Sprague-Dawley rats    | Effects at the LOAEL: \(\gamma\) liver wt, thyroid wt, \(\gamma\) centrilobular hepatocellular hypertrophy, \(\gamma\) pituitary gland basophilic cell  |
| PMRA# 2809212          | hypertrophy, $\uparrow$ thyroid follicular cell hypertrophy, $\uparrow$ prothrombin time, $\uparrow$ APTT ( $\circlearrowleft/$ $\updownarrow$ )  |
| 90-Day Oral Toxicity   | NOAEL = $10/12 \text{ mg/kg bw/day } (3/2)$   |
| (diet)                 | LOAEL = $34/40 \text{ mg/kg bw/day } (3/9)$   |
| Sprague-Dawley rats    | Effects at the LOAEL: \(\gamma\) thyroid wt, \(\gamma\) liver wt, \(\gamma\) thyroid follicular cell hypertrophy, \(\gamma\) total protein, \(\gamma\) GGT, \(\gamma\) calcium, \(\perp\) urine pH                                      |
| PMRA# 2809193          | $(\varnothing/\diamondsuit)$ ; $\uparrow$ APTT, $\uparrow$ cholesterol $(\varnothing)$ ; $\downarrow$ A:G ratio, $\uparrow$ platelet count, $\uparrow$ TSH $(\diamondsuit)$   |
|                        | No treatment-related FOB findings   |
| 90-Day Oral Toxicity   | NOAEL = $12/14 \text{ mg/kg bw/day } (3/2)$   |
| (diet)                 | LOAEL = not established/70 mg/kg bw/day ( $\circlearrowleft$ / $\updownarrow$ )   |
| Sprague-Dawley rats    |   |
| D D A // 2000106       | Effects at the LOAEL: ↑ liver wt, ↑ thyroid wt, ↑ adrenal wt, ↑   |
| PMRA# 2809196          | peripheral fatty change in liver, ↑ centrilobular hepatocellular  |
|                        | hypertrophy, † thyroid follicular cell hypertrophy, † hypertrophy of  |
|                        | pituitary basophilic cells, ↑ fatty change in adrenal cortex, ↑   |
|                        | platelet count, ↑ fibrinogen concentration, ↑ prothrombin time, ↑   |
|                        | APTT, ↓ mean corpuscular hemoglobin, ↓ mean corpuscular   |
|                        | volume, $\uparrow$ GGT, $\downarrow$ A:G ratio, $\uparrow$ total protein, $\uparrow$ urea nitrogen, $\uparrow$ calcium, $\downarrow$ bilirubin ( $\updownarrow$ )   |
|                        | No treatment-related FOB findings   |
| 28-Day Dermal Toxicity | NOAEL = 1000 mg/kg bw/day $(3/2)$   |
| Sprague-Dawley rats    |   |
| PMRA# 2809226          |   |

| Study  |  |
|--|--|
| type/animal/PMRA#                                  | Study results  |
| 28-Day Oral Toxicity                               | Supplemental – range-finding   |
| (diet)   | NOAEL and LOAEL not established  |
|  | Effects at 742/581 mg/kg bw/day: ↓ bw, ↓ bwg (bw loss overall in                                       |
| Beagle dogs  | high dose $\lozenge$ and all $\lozenge$ groups without dose-response), $\uparrow$ liver wt, $\uparrow$ |
|  | hepatocellular hypertrophy $(\partial/\mathcal{P})$ ; $\uparrow$ gallbladder wt without                |
| PMRA# 2809223                                      | microscopic correlates (3)   |
| 90-Day Oral Toxicity                               | NOAEL = $13/14 \text{ mg/kg bw/day } (3/2)$  |
| (diet)   | LOAEL = 133/130  mg/kg bw/day  (3/2)   |
|  |  |
| Beagle dogs  | Effects at the LOAEL: $\downarrow$ bw, $\downarrow$ bwg ( $\circlearrowleft/$ ?)                       |
|  |  |
| PMRA# 2809208                                      | 120 127 10110 11 11 11 (410)   |
| 1-Year Oral Toxicity (diet)                        | NOAEL = $40/43 \text{ mg/kg bw/day } (3/9)$  |
| D 1 1  | LOAEL = $327/298$ mg/kg bw/day ( $\Im/\Im$ )   |
| Beagle dogs  |  |
| PMRA# 2809210                                      | Effects at the LOAEL: ↑ liver wt, ↑ gallbladder wt, ↑  |
|  | hepatocellular hypertrophy, ↑ ALP, ↑ ALT, ↓ albumin (♂/♀)  |
| Chronic Toxicity/Oncoger<br>18-Month Oral Toxicity |  |
| (diet)   | NOAEL = $3.4/23$ mg/kg bw/day ( $\Im$ / $\Im$ )<br>LOAEL = $21/134$ mg/kg bw/day ( $\Im$ / $\Im$ )     |
| (diet)   | $LOAEL = 21/134 \operatorname{Hig/kg} \operatorname{ow/day} \left( \frac{1}{2} \right)$                |
| CD-1 mice  | Effects at the LOAEL: \(\gamma\) liver wt, \(\gamma\) hepatocellular hypertrophy, \(\gamma\)           |
|  | hepatocellular vacuolation $(3/2)$ ; $\uparrow$ cytoplasmic inclusion bodies                           |
| PMRA# 2809229                                      | in liver ( $\Diamond$ ); $\uparrow$ portal inflammatory cell infiltration ( $\Diamond$ )               |
|  | (\(\times\),   |
|  | No evidence of tumourigenicity   |
| 2-Year Oral Toxicity with                          | NOAEL = $2.3/3.0 \text{ mg/kg bw/day } (3/2)$  |
| 1-Year Satellite Group                             | LOAEL = 7.8/10 mg/kg bw/day $(3/2)$  |
| (diet)   |  |
|  | Effects at the LOAEL: \(\gamma\) thyroid follicular cell hypertrophy, \(\gamma\)                       |
| Sprague-Dawley rats                                | hepatocellular vacuolation, ↑ hepatocellular hypertrophy (♂/♀); ↑                                      |
|  | thyroid wt, ↑ eosinophilic foci in liver (♂); ↑ cholesterol, ↓   |
| PMRA# 2809231                                      | triglycerides, $\uparrow$ cystic degeneration in liver ( $\updownarrow$ )                              |
|  |  |
|  | Tumour incidences (in %)   |
|  | Thyroid follicular cell adenomas incidences (in %) at 0, 2.3, 7.8,                                     |
|  | and 27 mg/kg bw/day (3) were 3, 5, 3, and 16; and at 0, 3.0, 10,                                       |
|  | and 35 mg/kg bw/day ( $\updownarrow$ ) were 3, 3, 0, and 16  |
|  | Evidence of tumourisonicity  |
|  | Evidence of tumourigenicity  |

| Study<br>type/animal/PMRA#                      | Study results  |
|---|--|
| Developmental/Reproduct                         | ive Toxicity Studies   |
| 1-Generation Reproductive<br>Toxicity<br>(diet) | Supplemental – range-finding NOAEL and LOAEL not established Parental  |
| Sprague-Dawley rats PMRA# 2809235               | Effects at and above 12/15 mg/kg bw/day: $\uparrow$ hepatocellular hypertrophy (F1), $\uparrow$ thyroid follicular cell hypertrophy (F1) ( $\circlearrowleft$ / $\updownarrow$ ); $\uparrow$ thyroid wt (P), $\uparrow$ thyroid follicular cell hypertrophy (P), $\downarrow$ fc (F1) ( $\updownarrow$ ) |
|   | Effects at 45/58 mg/kg bw/day: $\uparrow$ liver wt, $\uparrow$ thyroid wt, $\uparrow$ hepatocellular hypertrophy (P) ( $\circlearrowleft$ / $\hookrightarrow$ ); $\downarrow$ fc, $\uparrow$ thyroid follicular cell hypertrophy (P) ( $\circlearrowleft$ )  |
|   | Reproductive No reproductive adverse effects observed  |
|   | Offspring No offspring adverse effects observed  |
| 2-Generation Reproductive Toxicity              | No evidence of sensitivity of the young  Parental NOAEL = $2.9/4.0 \text{ mg/kg bw/day } (3/2)$ Parental LOAEL = $12/16 \text{ mg/kg bw/day } (3/2)$   |
| (diet) Sprague-Dawley rats                      | Effects at the LOAEL: $\uparrow$ thyroid wt (F1), $\uparrow$ thyroid hypertrophy $( \circlearrowleft / \updownarrow )$ , $\uparrow$ TSH (P), $\uparrow$ kidney wt (F1 $\circlearrowleft$ ), $\uparrow$ hepatocellular hypertrophy (F1 $\circlearrowleft$ ), $\downarrow$ T4 ( $\updownarrow$ )           |
| PMRA# 2809237                                   | Reproductive NOAEL = 46/63 mg/kg bw/day Reproductive LOAEL not established   |
|   | Offspring NOAEL = 16 mg/kg bw/day Offspring LOAEL = 63 mg/kg bw/day  |
|   | Effects at the LOAEL: $\downarrow$ bw PND 14 and 21 (F2), $\uparrow$ thyroid hypertrophy (F2), $\uparrow$ liver wt, $\uparrow$ pups with purple, black, and/or pale areas on the head, body, or tail (F1), $\downarrow$ spleen wt (F2 $\updownarrow$ )   |
|   | No evidence of sensitivity of the young  |

| Study results   |
|---|
|   |
| Supplemental – range-finding  |
| NOAEL and LOAEL not established   |
| No maternal or developmental adverse effects observed up to 1000 mg/kg bw/day             |
|   |
| Maternal NOAEL = 1000 mg/kg bw/day  |
| Maternal LOAEL not established  |
| No maternal adverse effects observed  |
| Developmental NOAEL = 1000 mg/kg bw/day   |
| Developmental LOAEL not established   |
|   |
| No developmental adverse effects observed   |
| No evidence of sensitivity of the young   |
| Supplemental – range-finding  |
| NOAEL and LOAEL not established   |
| TVOTIED and EOTIED not established  |
| Effects at 300 mg/kg bw/day: ↓ bwg (GD 6-9 and 9-12), ↓ fc (GD                            |
| 6-18)   |
| 0-10)   |
| No developmental adverse effects observed up to 300 mg/kg                                 |
| bw/day  |
| Maternal NOAEL = 500 mg/kg bw/day   |
| Maternal LOAEL = 1000 mg/kg bw/day  |
| Waterial Eoree 1000 ing/kg ow/day   |
| Effects at the LOAEL: Thin appearance, bw loss (GD 6-9), ↓ bwg                            |
| (corrected for gravid uterine wt) (GD 6-29), $\downarrow$ bw (GD 25-29), $\downarrow$ fc, |
| $\uparrow$ rel. liver wt, scant feces   |
| 1 101. Hvor wt, scalit reces  |
| Developmental NOAEL = 500 mg/kg bw/day  |
|   |
| Developmental LOAEL = 1000 mg/kg bw/day   |
| Effects at the LOAEL: \( \) mean number ribs and corresponding                            |
| thoracic vertebrae related to $\downarrow$ mean number lumbar vertebrae                   |
| moracic vertebrae related to \$ mean number fumbar vertebrae                              |
| No evidence of sensitivity of the young   |
|   |

| Study                       | Study results   |  |
|-----------------------------|---|--|
| type/animal/PMRA#           | ·   |  |
| <b>Genotoxicity Studies</b> |   |  |
| Bacterial reverse mutation  | Negative ± metabolic activation   |  |
| assay                       |   |  |
|                             | Tested up to a limit concentration                                      |  |
| S. typhimurium strains      |   |  |
| TA1535, TA1537, TA98        |   |  |
| and TA100, and E coli       |   |  |
| strains WP2uvrA/pKM101      |   |  |
| PMRA# 2809251               |   |  |
| Chromosome aberration       | Negative ± metabolic activation   |  |
| Chromosome decrudion        | regulive = memorine denviation  |  |
| Chinese hamster lung        | Tested up to a cytotoxic concentration                                  |  |
| (CHL/IU) in vitro           |   |  |
|                             |   |  |
| PMRA# 2809297               |   |  |
| Gene mutation               | Negative ± metabolic activation   |  |
|                             |   |  |
| Mouse lymphoma L5178Y       | Tested up to a precipitating concentration                              |  |
| cells in vitro              |   |  |
| D                           |   |  |
| PMRA# 2809289               |   |  |
| Micronucleus                | Negative  |  |
| Mouse bone marrow in        | No mortality or clinical signs of toxicity                              |  |
| vivo $\delta$ CD-1 mice     | Two mortality of chilical signs of toxicity                             |  |
| VIVO O CD-1 linec           | Tested up to a limit dose   |  |
| PMRA# 2809300               | rested up to a minit dose   |  |
| Neurotoxicity studies       |   |  |
| Acute Neurotoxicity         | NOAEL = 2000 mg/kg bw $(\mathring{\Diamond}/\mathring{\Diamond})$       |  |
| (gavage)                    | LOAEL not established   |  |
|                             |   |  |
| Sprague-Dawley rats         | No adverse effects were observed  |  |
|                             |   |  |
| PMRA# 2809239               | No evidence of neurotoxicity  |  |
| Mechanistic studies         |   |  |
| Hepatic Drug-               | Supplemental – non-guideline  |  |
| Metabolizing Enzyme         | NOAEL and LOAEL not established   |  |
| Induction Study             |   |  |
| (diet)                      | Effects at and above 5.6 mg/kg bw/day: \(\gamma\) gene amplification of |  |
|                             | UGT1A1 (7 days)   |  |
| Sprague-Dawley rats (♂)     |   |  |
|                             | Effects at and above 62 mg/kg bw/day: ↓ T3 (14 days), ↑ TSH (7          |  |

| Study                        | C. I. I.   |  |  |
|------------------------------|--|--|--|
| type/animal/PMRA#            | Study results  |  |  |
| Groups were 7 days, 14       | days), ↑ hepatic microsomal protein (7 days, 14 days), ↑ UDP-GT                                  |  |  |
| days, or 14 days + 14 days   | activity (7 days), ↑ liver and thyroid wt (7 days), ↑ thyroid                                    |  |  |
| of recovery                  | follicular cell hypertrophy (7 days, 14 days), ↑ hepatocellular                                  |  |  |
| PMRA# 2809313                | hypertrophy (7 days, 14 days)  |  |  |
| FWIKA# 2009313               | Effects at 191 mg/kg bw/day: ↓ bwg day 1 (7 days), ↓ T3 (7 days),                                |  |  |
|                              | $\downarrow$ T4 (7 days, 14 days), $\uparrow$ TSH (14 days), $\uparrow$ liver and thyroid wt (14 |  |  |
|                              | days, 14+14 days), \(\gamma\) hypertrophy of basophilic cells in pituitary (7                    |  |  |
|                              | days, 14 days)   |  |  |
|                              | Recovery of effects was observed following cessation of treatment,                               |  |  |
|                              | though the liver and kidney weights had not completely returned to                               |  |  |
|                              | control levels   |  |  |
| Thyroid Peroxidase           | Supplemental – non-guideline   |  |  |
| Activity                     | Nagativa for thereoid paravidase activity inhibition   |  |  |
| Wistar rat thyroid tissue in | Negative for thyroid peroxidase activity inhibition  |  |  |
| vitro                        |  |  |  |
|                              |  |  |  |
| PMRA# 2809315                |  |  |  |
| Metabolites and isomers      |  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |  |
| assay<br>TZ-1E               | Tested up to a limit concentration   |  |  |
| 1Z-1E                        | rested up to a minit concentration   |  |  |
| S. typhimurium strains       |  |  |  |
| TA1535, TA1537, TA98         |  |  |  |
| and TA100, and E coli        |  |  |  |
| strains WP2uvrA/pKM101       |  |  |  |
| PMRA# 2809256                |  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |  |
| assay                        |  |  |  |
| TZ-2                         | Tested up to a limit concentration   |  |  |
| S. typhimurium strains       |  |  |  |
| TA1535, TA1537, TA98         |  |  |  |
| and TA100, and E coli        |  |  |  |
| strains WP2uvrA              |  |  |  |
| PMRA# 2809259                |  |  |  |

| G <sub>4</sub> 1   |  |  |
|--|--|--|
| Study<br>type/animal/PMRA#   | Study results                                    |  |
| Bacterial reverse mutation   | Negative ± metabolic activation                  |  |
| assay  | regative - metabone activation                   |  |
| TZ-2E  | Tested up to a limit concentration               |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA                         |  |  |
| PMRA# 2809262  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation                  |  |
| assay  |  |  |
| TY-2   | Tested up to a limit concentration               |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA                         |  |  |
| PMRA# 2809268  |  |  |
| Bacterial reverse mutation   | Positive in TA1535 $\pm$ S9                      |  |
| assay<br>TZ-4  | Negative ± metabolic activation in other strains |  |
| 12-4   | Tested up to a limit concentration               |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA/pKM101                  |  |  |
| PMRA# 2809272  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation                  |  |
| assay<br>TZ-5  | Tested up to a limit concentration               |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA/pKM101<br>PMRA# 2809275 |  |  |

| Study  | Study results  |  |
|--|--|--|
| type/animal/PMRA#  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |
| assay<br>BPOH-NF-171   | Tested up to a limit concentration   |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA |  |  |
| PMRA# 2809280  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |
| assay  | The state of the s |  |
| Me-NF-171  | Tested up to a limit concentration   |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA |  |  |
| PMRA# 2809283  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |
| assay  |  |  |
| TT-1   | Tested up to a limit concentration   |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA |  |  |
| PMRA# 3082017  |  |  |
| Bacterial reverse mutation   | Negative ± metabolic activation  |  |
| assay  |  |  |
| TT-3K  | Tested up to a limit concentration   |  |
| S. typhimurium strains<br>TA1535, TA1537, TA98<br>and TA100, and E coli<br>strains WP2uvrA |  |  |
| PMRA# 3082007  |  |  |

| Study                                 | Study results   |  |
|---------------------------------------|---|--|
| type/animal/PMRA#                     | Study Todates   |  |
| Micronucleus                          | Negative  |  |
| Mouse bone marrow in vivo ♂ CD-1 mice | No mortality or clinical signs of toxicity                        |  |
| PMRA# 2809302                         | Tested up to a limit dose   |  |
| Acute Oral Toxicity                   | $LD_{50} > 2000 \text{ mg/kg bw } (\updownarrow)$                 |  |
| (gavage) Fixed dose                   |   |  |
| method                                | Low toxicity  |  |
| TZ-1E                                 |   |  |
| ♀ Sprague-Dawley rats                 |   |  |
| PMRA# 2809144                         |   |  |
| Acute Oral Toxicity                   | LD <sub>50</sub> between 300 and 2000 mg/kg bw ( $\updownarrow$ ) |  |
| (gavage) Fixed dose                   |   |  |
| method                                | Moderate toxicity (low overall when combined with PMRA#           |  |
| TZ-2                                  | 2809148)  |  |
| ♀ Sprague-Dawley rats                 |   |  |
| PMRA# 2809146                         |   |  |
| Acute Oral Toxicity                   | $LD_{50} > 2000 \text{ mg/kg bw } (\mathfrak{P})$                 |  |
| (gavage) Toxic class                  |   |  |
| method                                | Low toxicity  |  |
| TZ-2                                  |   |  |
| ♀ Sprague-Dawley rats                 |   |  |
| PMRA# 2809148                         |   |  |
| Acute Oral Toxicity                   | $LD_{50} > 2000 \text{ mg/kg bw } (?)$                            |  |
| (gavage) Toxic class                  |   |  |
| method                                | Low toxicity  |  |
| TZ-2E                                 |   |  |
| ♀ Sprague-Dawley rats                 |   |  |
| PMRA# 2809150                         |   |  |

| Study                  |   |
|------------------------|---|
| type/animal/PMRA#      | Study results   |
| Acute Oral Toxicity    | $LD_{50} > 2000 \text{ mg/kg bw } (\mathfrak{P})$                   |
| (gavage) Toxic class   | (+)   |
| method                 | Low toxicity  |
| TZ-4                   |   |
| ♀ Sprague-Dawley rats  |   |
| PMRA# 2809155          |   |
| Acute Oral Toxicity    | LD <sub>50</sub> between 300 and 2000 mg/kg bw (♀)                  |
| (gavage) Toxic class   | Two mortalities out of three tested at 2000 mg/kg bw, none at 300   |
| method                 | mg/kg bw  |
| TZ-5                   |   |
|                        | Moderate toxicity   |
| ♀ Sprague-Dawley rats  |   |
| PMRA# 2809160          |   |
| Acute Oral Toxicity    | LD <sub>50</sub> between 300 and 2000 mg/kg bw (♀)                  |
| (gavage) Toxic class   | Three mortalities out of three tested at 2000 mg/kg bw, none at 300 |
|                        | mg/kg bw  |
| TY-2                   |   |
| ♀ Sprague-Dawley rats  | Moderate toxicity   |
| PMRA# 2809162          |   |
| Acute Oral Toxicity    | $LD_{50} > 2000 \text{ mg/kg bw } (\mathfrak{P})$                   |
| (gavage) Toxic class   |   |
| method                 | Low toxicity  |
| BPOH-NF-171            |   |
| ♀ Sprague-Dawley rats  |   |
| + Spragae Dawley ratio |   |
| PMRA# 2809164          |   |
| Acute Oral Toxicity    | $LD_{50} > 2000 \text{ mg/kg bw } (?)$                              |
| (gavage) Toxic class   |   |
| method                 | Low toxicity  |
| Me-NF-171              |   |
| ♀ Sprague-Dawley rats  |   |
| PMRA# 2809166          |   |

| Study                           |  |
|---------------------------------|--|
| type/animal/PMRA#               | Study results  |
| Acute Oral Toxicity             | $LD_{50} > 2000 \text{ mg/kg bw } (\mathfrak{P})$  |
| (gavage) Toxic class            |  |
| method                          | Low toxicity   |
| TT-1                            |  |
|                                 |  |
| ♀ Sprague-Dawley rats           |  |
| PMRA# 3082012                   |  |
| Acute Oral Toxicity             | $LD_{50} > 2000 \text{ mg/kg bw } (\stackrel{\bigcirc}{\hookrightarrow})$  |
| (gavage) Toxic class            |  |
| method                          | Low toxicity   |
| TT-3K                           |  |
| ♀ Sprague-Dawley rats           |  |
| + ~F-ugus = uesy euro           |  |
| PMRA# 3082006                   |  |
| 90-Day Oral Toxicity            | NOAEL = $34/39$ mg/kg bw/day ( $3/2$ )   |
| (diet)                          | LOAEL = $68/77 \text{ mg/kg bw/day } (3/9)$  |
| TZ-1E                           |  |
|                                 | Effects at the LOAEL: \(\gamma\) hepatocellular hypertrophy, \(\gamma\) liver wt, \(\gamma\)   |
| Sprague-Dawley rats             | potassium ( $\circlearrowleft$ ); $\downarrow$ bw, $\downarrow$ bwg, $\uparrow$ abs liver wt, $\uparrow$ T3, $\uparrow$ T4, $\uparrow$   |
|                                 | cholesterol, $\downarrow$ A:G ratio ( $\updownarrow$ )   |
| PMRA# 2809203                   |  |
|                                 | No treatment-related FOB findings  |
| 28-Day Oral Toxicity            | Supplemental – range-finding, non-GLP  |
| (diet, $\partial/\varphi$ ) and | NOAEL and LOAEL not established  |
| 29- or 79-Day Oral              | Tico   |
| Toxicity                        | Effects at and above 74/85 mg/kg bw/day (28-day study): ↑  |
| (diet, lower dose levels        | cellular infiltration and granular casts in the outer stripe of the  |
|                                 | outer medulla of the kidneys (♂), ↑ basophilic tubules and tubular   |
|                                 | dilatation in kidney ( $\circlearrowleft$ ), $\uparrow$ rel. kidney wt ( $\circlearrowleft$ )  |
| to kidneys)<br>TZ-5             | Effects at and above 212/240 mg/kg bw/day (28-day study): ↑ rel.   |
| 12-3                            | liver wt, $\uparrow$ centrilobular hepatocellular hypertrophy ( $\circlearrowleft$ / $\hookrightarrow$ ); $\downarrow$ bw, $\downarrow$  |
| Sprague-Dawley rats             | bwg, $\downarrow$ fc, $\downarrow$ fe, $\uparrow$ blood urea nitrogen, $\uparrow$ platelet count, $\downarrow$   |
|                                 | reticulocyte count and ratio (3)   |
| PMRA# 2809220                   | (0)  |
|                                 | Effects at 723/829 mg/kg bw/day (28-day study): \(\gamma\) abs liver wt, \(\gamma\)  |
|                                 | thyroid follicular cell hypertrophy, $\uparrow$ total protein, $\downarrow$ GGT ( $\circlearrowleft/\diamondsuit$ ); $\uparrow$ rel. thyroid wt, $\uparrow$ rel. adrenal wt, $\uparrow$ vacuolation in adrenal, $\uparrow$ total cholesterol, $\downarrow$ bilirubin, $\uparrow$ $\alpha$ 2u-globulin ( $\circlearrowleft$ ); $\downarrow$ bw, $\downarrow$ bwg, $\downarrow$ fc, $\downarrow$ fe ( $\diamondsuit$ ) |
|                                 |  |

| Study                                  | Study results   |
|--|---|
| type/animal/PMRA#                      | Study Tesuits   |
|  | Effects at and above 2 mg/kg bw/day (29-day study): ↑ eosinophilic bodies in kidneys, related to α2u-globulin (♂)   |
|  | Effects at and above 23 mg/kg bw/day (29-day study): ↑ basophilic tubules and tubular dilatation in kidneys (♂)   |
|  | Effects at 74 mg/kg bw/day (29-day study): ↑ pale kidney (♂), ↑ granular casts in kidneys (♂)   |
|  | Effects at and above 24 mg/kg bw/day (28-day study): ↑ eosinophilic bodies in kidneys (♂)   |
|  | Effects at and above 2 mg/kg bw/day (79-day study): ↑ eosinophilic bodies in kidneys, related to α2u-globulin (♂)   |
|  | Effects at and above 6 mg/kg bw/day (79-day study): ↑ basophilic tubules in kidneys (♂)   |
|  | Effects at and above 19 mg/kg bw/day (79-day-study): ↑ cellular infiltration and granular casts in the outer stripe of the outer medulla of the kidneys (♂) |
|  | Effects at 62 mg/kg bw/day (79-day study): ↑ pale kidney (♂)  |
| 90-Day Oral Toxicity<br>(diet)<br>TZ-5 | NOAEL = $36/46$ mg/kg bw/day ( $\Im$ / $\Im$ )<br>LOAEL = $122/154$ mg/kg bw/day ( $\Im$ / $\Im$ )  |
| 12-3                                   | Effects at the LOAEL: ↑ degeneration and hyperplasia of olfactory   |
| Sprague-Dawley rats                    | epithelium $(\partial/\varphi)$ ; $\downarrow$ A:G ratio, $\downarrow$ glucose, $\uparrow$ blood urea nitrogen, $\uparrow$                                  |
| PMRA# 2809206                          | GGT, $\downarrow$ urinary pH ( $\circlearrowleft$ ); $\downarrow$ bwg, $\uparrow$ hepatocellular hypertrophy, $\uparrow$ rel. kidney wt ( $\updownarrow$ )  |
|  | No treatment-related FOB findings   |
| 28-Day Oral Toxicity                   | NOAEL = $1754/1805$ mg/kg bw/day ( $\circlearrowleft/$ ?)   |
| (diet)<br>TT-3K                        | LOAEL not established   |
| Sprague-Dawley rats                    |   |
| PMRA# 3082014                          |   |

| Study<br>type/animal/PMRA# | Study results  |
|----------------------------|--|
| 90-Day Oral Toxicity       | NOAEL = $1263/283$ mg/kg bw/day $(3/2)$                                    |
| (diet)                     | LOAEL not established/1433 mg/kg bw/day (♂/♀)                              |
| TT-3K                      |  |
|                            | Effects at the LOAEL: $\downarrow$ bw, $\downarrow$ bwg ( $\updownarrow$ ) |
| Sprague-Dawley rats        |  |
|                            |  |
| PMRA# 3082015              |  |

Table 4 Toxicity profile of the end-use product VAYANTIS Seed Treatment, containing picarbutrazox

| Study type/animal/PMRA #     | Study results  |
|------------------------------|--|
| Acute Oral Toxicity (gavage) | $LD_{50} > 2000 \text{ mg/kg bw } (\updownarrow)$  |
| Wistar rats                  | No clinical signs of toxicity  |
| PMRA# 2808534                | Low acute toxicity   |
| Acute Dermal Toxicity        | $LD_{50} > 2000 \text{ mg/kg bw } (3/2)$   |
| Wistar rats                  | No clinical signs of toxicity  |
| PMRA# 2808536                | Low acute toxicity   |
| Acute Inhalation Toxicity    | $LC_{50} > 3.04 \text{ mg/L} (6/2)$  |
| Wistar rats PMRA# 2808538    | Clinical signs at 3.04 mg/L included red-brown fur staining, slight laboured and/or noisy respiration, and slightly \( \psi activity |
|                              | Low acute toxicity   |
| Eye Irritation               | MAS = 2/110, $MIS = 11/110$ at 1 hour  |
| NZW rabbits                  | Minimally irritating   |
| PMRA# 2808540                |  |
| Eye Irritation               | ICE Class I  |
| Isolated chicken eyes        | Minimally irritating   |
| PMRA# 2808542                |  |

| Study type/animal/PMRA #             | Study results        |
|--------------------------------------|----------------------|
| Dermal Irritation                    | MAS = 0/8, MIS = 0/8 |
| NZW rabbits                          | Non-irritating       |
| PMRA# 2808544                        |                      |
| Skin Sensitization, Local Lymph Node | Negative             |
| Assay                                |                      |
| CBA/Ca mice                          |                      |
| PMRA# 2808547                        |                      |

Table 5 Toxicology reference values for use in health risk assessment for picarbutrazox

| <b>Exposure Scenario</b> | Study   | Point of Departure and Endpoint     | CAF <sup>1</sup> or |
|--------------------------|---|-------------------------------------|---------------------|
|                          |   |                                     | Target MOE          |
| Acute dietary            | Not required as an endpoint of concern attributable to a single exposure was only |                                     |                     |
| general population       | identified at the limit dose  | in the oral toxicity studies        |                     |
| Repeated (chronic)       | 2-year dietary toxicity in  | NOAEL = 2.3  mg/kg bw/day           | 100                 |
| dietary                  | the rat   | Liver and thyroid effects           |                     |
|                          | ADI = 0.02  mg/kg bw/day  | Y                                   |                     |
| Short and                | 28-day dermal toxicity in   | NOAEL = 1000  mg/kg bw/day          | 100                 |
| intermediate-term        | the rat   | No adverse effects                  |                     |
| dermal                   |   |                                     |                     |
| Short-term               | 28-day oral toxicity in the   | NOAEL = 15 mg/kg bw/day             | 100                 |
| inhalation <sup>2</sup>  | rat   | Liver, thyroid, and pituitary gland |                     |
|                          |   | effects                             |                     |
| Intermediate-term        | 2-generation reproductive   | Parental NOAEL = 2.9 mg/kg bw/day   | 100                 |
| inhalation <sup>2</sup>  | toxicity in the rat   | Thyroid effects                     |                     |
| Aggregate                | Due to the absence of residential uses, potential aggregation involves food and   |                                     |                     |
|                          | drinking water exposure only. Use of the ADI in this scenario is appropriate.     |                                     |                     |
| Cancer                   | Cancer risk (threshold) was addressed through the selected toxicology reference   |                                     |                     |
|                          | values.   |                                     |                     |

<sup>&</sup>lt;sup>1</sup> CAF (composite assessment factor) refers to a total of uncertainty and PCPA factors for dietary assessments; MOE refers to a target MOE for occupational assessments.

<sup>&</sup>lt;sup>2</sup> Since an oral NOAEL was selected, an inhalation absorption factor of 100% (default value) was used in route-to-route extrapolation.

Table 6 Exposure and risk estimates for commercial workers treating corn and soybean seeds with VAYANTIS Seed
Treatment

| Tasks                        | Unit Exposure <sup>1</sup> |                | Rate Commercial (g a.i./ Throughput <sup>2</sup> |                |                                | Daily Exposure (mg/kg bw/ day) <sup>3,4</sup> |                         | Calculated MOE      |                         |
|------------------------------|----------------------------|----------------|--|----------------|--------------------------------|---|-------------------------|---------------------|-------------------------|
| I asks                       | Dermal                     | Inhalation     | Units  | 100 kg seed)   | (kg seed/day)                  | Dermal  | Inhalation              | Dermal <sup>5</sup> | Inhalation <sup>6</sup> |
| Corn seeds – usin            | g corn uni                 | it exposures f | rom the AH806                                    | 2010 study; Pl | PE <sup>7</sup> : single layer | + CR gloves; clos                             | sed M/L                 |                     |                         |
| Treaters                     | 256                        | 3.72           | μg/kg a.i.<br>handled                            | 5              | 125 000                        | $2.00 \times 10^{-2}$                         | 2.91 × 10 <sup>-4</sup> | 50 000              | 9980                    |
| Baggers/<br>sewers/ stackers | 238                        | 18.7           | μg/kg a.i.<br>handled                            | 5              | 125 000                        | $1.86 \times 10^{-2}$                         | $1.46 \times 10^{-3}$   | 53 800              | 1990                    |
| Cleaners                     | 127                        | 24.1           | μg/g a.i./<br>100 kg seeds                       | 5              | N/A                            | $7.94 \times 10^{-3}$                         | $1.51 \times 10^{-3}$   | 126 000             | 1930                    |
| Soybean seeds – ı            | ısing corn                 | unit exposure  | es from the AH                                   | 806 2010 study | ; PPE: single lay              | er + CR gloves; o                             | closed M/L              |                     |                         |
| Treaters                     | 256                        | 3.72           | μg/kg a.i.<br>handled                            | 2.5            | 63 000                         | $5.04 \times 10^{-3}$                         | $7.32 \times 10^{-5}$   | 198 000             | 39600                   |
| Baggers/<br>sewers/ stackers | 238                        | 18.7           | μg/kg a.i.<br>handled                            | 2.5            | 63 000                         | $4.69 \times 10^{-3}$                         | $3.68 \times 10^{-4}$   | 213 000             | 7880                    |
| Cleaners                     | 127                        | 24.1           | μg/g a.i./<br>100 kg seed                        | 2.5            | N/A                            | $3.97 \times 10^{-3}$                         | 7.53 × 10 <sup>-4</sup> | 252 000             | 3850                    |

<sup>&</sup>lt;sup>1</sup> Dermal and inhalation unit exposure values (arithmetic means) are from the specified surrogate exposure study (AH806 2010). Unit exposure values for mixers/loaders and baggers/sewers/stackers are in  $\mu$ g/kg a.i. handled, while unit exposure values for cleaners are in  $\mu$ g/g a.i./100 kg seeds.

<sup>&</sup>lt;sup>2</sup> Commercial throughput values are from the PMRA's memo "Commercial Seed Treatment Throughput Values".

<sup>&</sup>lt;sup>3</sup> For mixers/loaders and baggers/sewers/stackers: dermal/inhalation daily exposure (mg/kg bw/day) = [dermal/inhalation unit exposure ( $\mu$ g/kg a.i. handled) × Rate (g a.i./100 kg seed) ÷ 100 × Commercial Throughput (kg seed/day)] / [80 kg bw × 1000  $\mu$ g/mg].

<sup>&</sup>lt;sup>4</sup> For cleaners: dermal/inhalation daily exposure (mg/kg bw/day) = [dermal/inhalation unit exposure (μg/g a.i. /100 kg seed) × application rate in g a.i./100 kg seed] / [80 kg bw × 1000 μg/mg].

<sup>&</sup>lt;sup>5</sup> Based on the short- to intermediate-term dermal NOAEL of 1000 mg/kg bw/day and a target MOE of 100.

<sup>&</sup>lt;sup>6</sup>Based on the intermediate-term oral NOAEL of 2.9 mg/kg bw/day and a target MOE of 100.

<sup>&</sup>lt;sup>7</sup> PPE: personal protective equipment; CR: chemical-resistant; M/L: mixing and loading.

Table 7 Exposure and risk estimates for workers handling and planting corn and soybean seeds treated with VAYANTIS Seed Treatment

| Crop         | Unit Exposure¹<br>(μg/kg ai handled) |                | •                  |                      | Daily Exposure<br>(mg/kg bw/ day) <sup>3</sup> |                            | Calculated MOE      |                         |
|--------------|--------------------------------------|----------------|--------------------|----------------------|--|----------------------------|---------------------|-------------------------|
| Стор         | Dermal                               | Inhalation     | 100 kg seed)       |                      | Dermal   | Inhalation                 | Dermal <sup>4</sup> | Inhalation <sup>5</sup> |
| Using corn u | nit exposures                        | from the AH825 | 2007 study (bagged | seeds); PPE6: Single | layer + CR glove                               | s; closed-cab <sup>7</sup> |                     |                         |
| Corn         | 1515                                 | 82.83          | 5                  | 1350                 | $1.28 \times 10^{-3}$                          | $6.99\times10^{-5}$        | 782000              | 215000                  |
| Soybean      | 1515                                 | 82.83          | 2.5                | 9000                 | 4.26 × 10 <sup>-3</sup>                        | 2.33 × 10 <sup>-4</sup>    | 235000              | 64400                   |

<sup>&</sup>lt;sup>1</sup> Dermal and inhalation unit exposure values (arithmetic means) are from the specified surrogate exposure study (AH825 2007).

<sup>&</sup>lt;sup>2</sup> The amounts of seed planted per day (kg seed/day) are from the PMRA's 'Seed Treated Planted Per Day-2018' table.

<sup>&</sup>lt;sup>3</sup> Dermal/inhalation daily exposure (mg/kg bw/day) = [dermal/inhalation unit exposure ( $\mu$ g/kg a.i. handled) × Rate (g a.i./100 kg seed) ÷ 100 × Seed Planted (kg seed/day)] / [80 kg bw × 1000  $\mu$ g/mg].

<sup>&</sup>lt;sup>4</sup> Based on the short- to intermediate-term dermal NOAEL of 1000 mg/kg bw/day and a target MOE of 100.

<sup>&</sup>lt;sup>5</sup> Based on the short-term oral NOAEL of 15 mg/kg bw/day and a target MOE of 100.

<sup>&</sup>lt;sup>6</sup> PPE: personal protective equipment; CR: chemical-resistant

<sup>&</sup>lt;sup>7</sup> Since the calculated MOEs are well above the target MOE of 100, the requirement of closed-cab planters can be waived.

 Table 8
 Integrated food residue chemistry summary

| NATURE OF       | THE RI              | ESIDUE IN   | N LAYING HEN   | PMRA # 2809                 | 320               |  |  |  |  |
|-----------------|---------------------|---|--|-----------------------------|-------------------|--|--|--|--|
| Species and N   | umbers              | 6 laying h  | ens (White Star)   |                             |                   |  |  |  |  |
|                 |                     | [Phenyl-U   | [- <sup>14</sup> C]-picarbutrazox  | (specific activity: 3.02    | 2 MBq/mg [81.62   |  |  |  |  |
| Dadialahal na   | Radiolabel position |   |  | , 1                         | 1 0 1             |  |  |  |  |
| Radiolabel pos  | SILIOII             | [Pyridine-  | 4- <sup>14</sup> C]-picarbutrazox  | x (specific activity: 3.0   | 1 MBq/mg [81.35   |  |  |  |  |
|                 |                     | μCi/mg])  |  |                             |                   |  |  |  |  |
|                 |                     | [Phenyl-U   | [Phenyl-U- <sup>14</sup> C]-picarbutrazox: 12.635 mg/kg corresponding to 0.858 |                             |                   |  |  |  |  |
|                 |                     | mg picarbutrazox equivalents/kg body weight.  |  |                             |                   |  |  |  |  |
|                 |                     |   |  | x: 11.018 mg/kg corres      | ponding to 0.793  |  |  |  |  |
| Average dose    |                     | mg picarb   | utrazox equivalents/   | kg body weight.             |                   |  |  |  |  |
|                 |                     |   |  |                             |                   |  |  |  |  |
|                 |                     | _   | nt to 1102–1263× th  | e calculated dietary k      | ourden for        |  |  |  |  |
| T D             |                     | poultry.  | 1 4 1  | 1 '1                        |                   |  |  |  |  |
| Treatment Reg   | gimen               |   | gelatin capsule once   | aally                       |                   |  |  |  |  |
| Study period    |                     | 14 consect  |  | 1 ' ) E /                   | 1                 |  |  |  |  |
| Collection tim  | e                   |   |  | nd evening); Excreta: o     | -                 |  |  |  |  |
| Tissues collect | ted                 | Liver, fat, skin with fat, muscle, gastrointestinal (GI) tract and its  |  |                             |                   |  |  |  |  |
| Interval from 1 | ast dosa            | contents, blood, carcass and bile.  11 hours  |  |                             |                   |  |  |  |  |
| to sacrifice    | asi dose            | 11 Hours  |  |                             |                   |  |  |  |  |
|                 |                     | The TRR   | in egg volk reached  | a plateau of approxima      | ately 0 009 mg/kg |  |  |  |  |
| Plateau of resi | dues in             | The TRR in egg yolk reached a plateau of approximately 0.009 mg/kg (phenyl) and 0.020 mg/kg (pyridine) after 7 days and 9 days (168 – 216 |  |                             |                   |  |  |  |  |
| eggs            |                     | hours) dosing, respectively.  |  |                             |                   |  |  |  |  |
| Extraction solv | vents               | acetonitrile:water $(4:1-1:1, v/v) \pm hexane$  |  |                             |                   |  |  |  |  |
|                 |                     |   | <sup>4</sup> C-label   | Pyridine-14C-label          |                   |  |  |  |  |
| Matriana        |                     | ·   | % of   | ·                           | % of              |  |  |  |  |
| Matrices        | TRRs (ppm)          |   | Administered   | TRRs (ppm)                  | Administered      |  |  |  |  |
|                 |                     |   | Dose   |                             | Dose              |  |  |  |  |
| Excreta         |                     |   | 100  |                             | 93.7              |  |  |  |  |
| Cage Wash       |                     |   | 5.3  |                             | 4.2               |  |  |  |  |
| GI Tract and    |                     |   | <0.1   |                             | <0.1              |  |  |  |  |
| Contents        |                     |   | <b>\0.1</b>  |                             | <b>\0.1</b>       |  |  |  |  |
| Pooled Egg      |                     |   |  |                             |                   |  |  |  |  |
| Yolk (Day 8–    | 0.011               |   | < 0.1  | 0.014                       | <0.1              |  |  |  |  |
| 14)             |                     |   |  |                             |                   |  |  |  |  |
| Pooled Egg      | 0.009               |   |  | 0.651                       |                   |  |  |  |  |
| White (mean     |                     |   | <0.1   | 0.021                       | < 0.1             |  |  |  |  |
| of Day 8–14)    |                     | 0.40  | .0.1   | 0.024                       | .0.1              |  |  |  |  |
| Liver           | 0.                  | .040  | < 0.1  | 0.034                       | <0.1              |  |  |  |  |
| III.of          | 0.002-0.004         |   | 2O 1   |                             |                   |  |  |  |  |
| Fat<br>Muscle   |                     | 2-0.004<br>.001   | <0.1<br><0.1   | 0.004-0.005<br><0.001-0.002 | <0.1<br><0.1      |  |  |  |  |

| Summary of Major Identified Metabolites in Hen Matrices |  |  |  |  |  |
|---|--|--|--|--|--|
| Radiolabel Position                                     | [Phenyl- <sup>14</sup> C], [Pyridine- <sup>14</sup> C] |  |  |  |  |
| Metabolites Identified                                  | Major Metabolites                                      |  |  |  |  |
| Liver   | TZ-9   |  |  |  |  |
| Egg volka   | TZ-9   |  |  |  |  |
| Egg yolks   | TZ-7   |  |  |  |  |
| Egg whites  | TZ-9   |  |  |  |  |
| Egg whites  | TZ-7   |  |  |  |  |

| Nature Of The                | Residue II   | 1 Lactatin   | ıg Goat                 | PMRA# 28093                     | 322                    |  |  |  |
|------------------------------|--------------|--|-------------------------|---------------------------------|------------------------|--|--|--|
| Species and Nu               | mbers        | 2 lactatin   | g goats (one per label) | (Toggenburg)                    |                        |  |  |  |
| Radiolabel posi              | ition        | [Phenyl-U- <sup>14</sup> C]-picarbutrazox (specific activity: 3.02 MBq/mg [81.62 μCi/mg]) [Pyridine-4- <sup>14</sup> C]-picarbutrazox (specific activity: 3.01 MBq/mg [81.35 μCi/mg])  |                         |                                 |                        |  |  |  |
| Average dose                 |              | [Phenyl-U- <sup>14</sup> C]-picarbutrazox: 20.322 mg/kg corresponding to 0.858 mg picarbutrazox equivalents/kg body weight. [Pyridine-4- <sup>14</sup> C]-picarbutrazox: 22.580 mg/kg corresponding to 0.793 mg picarbutrazox equivalents/kg body weight.  Equivalent to ~1016–1129× the calculated dietary burden for dairy cattle. |                         |                                 |                        |  |  |  |
| Treatment Regi               | imen         | Orally by  | gelatin capsule once of | daily                           |                        |  |  |  |
| Study period                 |              | 7 consecu  | 2                       |                                 |                        |  |  |  |
| Collection time              | ;            | Milk: twice a day (morning and evening); Excreta: once a day   |                         |                                 |                        |  |  |  |
| Tissues collecte             | ed           | Liver, kidney, fat, muscle, gastrointestinal (GI) tract and its contents, and bile   |                         |                                 |                        |  |  |  |
| Interval from la sacrifice   | st dose to   | 12 hours   |                         |                                 |                        |  |  |  |
| Plateau of resid             | lues in milk | The TRR in milk reached a plateau at the end of dosing: 0.1% of the TRR (both labels; 0.019 ppm).  |                         |                                 |                        |  |  |  |
| Extraction solv              | ents         | acetonitrile: water $(4:1-1:1, v/v) \pm hexane$  |                         |                                 |                        |  |  |  |
|                              |              | Phenyl-1   | <sup>14</sup> C-label   | Pyridine- <sup>14</sup> C-label |                        |  |  |  |
| Matrices                     | TRRs (       | (ppm)  | % of Administered Dose  | TRRs (ppm)                      | % of Administered Dose |  |  |  |
| Urine                        |              |  | 11.8                    |                                 | 8.0                    |  |  |  |
| Feces                        |              | i  | 56.8                    |                                 | 67.8                   |  |  |  |
| Cage Wash                    |              |  | 1.3                     |                                 | 2.7                    |  |  |  |
| GI Tract & Contents          |              |  | 15.1                    |                                 | 10.2                   |  |  |  |
| Milk<br>(120 hour<br>sample) | 0.280        |  | 0.3                     | 0.018                           | 0.1                    |  |  |  |
| Liver                        | 0.23         | 80   | 0.3                     | 0.619                           | 0.5                    |  |  |  |

| Kidney              | 0.090       |               | < 0.1                | 0.118              | < 0.1  |  |  |
|---------------------|-------------|---------------|----------------------|--------------------|--------|--|--|
| Fat                 | 0.08        | 36            | < 0.03               | 0.123              | < 0.4  |  |  |
| Muscle              | 0.01        | 13            | < 0.02               | 0.033              | < 0.02 |  |  |
| <b>Summary of M</b> | Iajor Ident | ified Meta    | abolites in Goat Mat | rices              |        |  |  |
| Radiolabel Posi     | ition       |               | [14C-Phene           | ol], [14C-Pyidine] |        |  |  |
| Metabolites Ide     | entified    |               | Major                | • Metabolites      |        |  |  |
| Muscle              |             |               | Pica                 | arbutrazox         |        |  |  |
|                     |             |               | •                    | TZ-1-2             |        |  |  |
|                     |             | TZ-7          |                      |                    |        |  |  |
| Fat                 |             | Picarbutrazox |                      |                    |        |  |  |
|                     |             | TZ-7          |                      |                    |        |  |  |
| Kidney              |             |               |                      | TZ-9               |        |  |  |
| Liver               |             | TZ-7          |                      |                    |        |  |  |
|                     |             |               |                      | TZ-9               |        |  |  |
|                     |             |               |                      | TZ-10              |        |  |  |
| Milk                |             |               |                      | TZ-9               |        |  |  |

### FREEZER STORAGE STABILITY IN ANIMAL MATRICES

Freezer storage stability data was not required as livestock feeding studies were not submitted or required in support of the current petition.

# LIVESTOCK FEEDING – Dairy cattle

A feeding study was not required based on the low dietary burden. Therefore, the goat metabolism study was used to estimate the anticipated residues in the relevant livestock matrices.

| Matrices          | Residue<br>Definition | Dietary Burden (ppm) | Anticipated Residues (ppm) |
|-------------------|-----------------------|----------------------|----------------------------|
| Dairy/Beef Cattle |                       |                      |                            |
| Whole milk        |                       |                      | 0                          |
| Fat               |                       |                      | 0                          |
| Liver             | Picarbutrazox         | 0.010                | 0                          |
| Kidney            |                       |                      | 0                          |
| Muscle            |                       |                      | 0                          |
| Swine             |                       |                      |                            |
| Fat               |                       |                      | 0                          |
| Liver             | Diagrhystrogray       | 0.006                | 0                          |
| Kidney            | Picarbutrazox         | 0.006                | 0                          |
| Muscle            |                       |                      | 0                          |

# **LIVESTOCK FEEDING – Laying hens**

A feeding study was not required based on the low dietary burden. Therefore, the poultry metabolism study was used to estimate the anticipated residues in the relevant livestock matrices.

| Matrices | Residue<br>Definition | Dietary Burden<br>(ppm) | Anticipated Residues (ppm) |
|----------|-----------------------|-------------------------|----------------------------|
| Eggs     |                       |                         | 0                          |
| Fat      | Picarbutrazox         | 0.006                   | 0                          |
| Liver    |                       | 0.000                   | 0                          |
| Muscle   |                       |                         | 0                          |

| NATURE OF THE RES   | IDUE IN LETTUCE - Phenyl and Pyridinyl PMRA # 2809324                            |  |  |  |
|---------------------|--|--|--|--|
| labels              | PMRA # 2009324   |  |  |  |
| Radiolabel Position | [Phenyl-U- <sup>14</sup> C]-picarbutrazox (specific activity: 3.02 MBq/mg)       |  |  |  |
| Radiolabel Position | [Pyridine-4- <sup>14</sup> C]-picarbutrazox (specific activity: 3.01 MBq/mg)     |  |  |  |
| Treatment           |  |  |  |  |
| Test Site           | Lettuce plants were grown in a greenhouse setting in 5m <sup>2</sup> plot boxes. |  |  |  |
| Treatment           | Three broadcast foliar applications performed with a 5-day retreatment           |  |  |  |
| Treatment           | interval at BBCH 44, 45 and 46 at 108–113 g a.i./ha.                             |  |  |  |
| Total Rate          | 328–338 g a.i./ha  |  |  |  |
| Formulation         | Suspension concentrate (SC) formulation: 10% picarbutrazox.                      |  |  |  |

|                               | la i a   |                               |  |   |
|-------------------------------|--|-------------------------------|--|---|
| Harvest                       |  |                               |  | sted just prior to the second               |
| F44i4-                        |  |                               |  | fter the third application.                 |
| Extraction solvents           |  | :water (                      | (1:1, v/v) and acet                    |   |
| Matrices                      | PHI  |                               | [14C- Phenyl]                          | [14C- Pyridine]                             |
|                               | (days)   |                               | TRR (ppm)                              | TRR (ppm)                                   |
| Harvest 1 – leaves            | Prior to 2 <sup>nd</sup> application   |                               | 1.484                                  | 1.001                                       |
| Harvest 2 – leaves            | 2  |                               | 2.835                                  | 4.084                                       |
| Harvest 3 – leaves            | 7  |                               | 3.075                                  | 3.091                                       |
| Harvest 4 – leaves            | 14   |                               | 2.471                                  | 1.634                                       |
| <b>SUMMARY OF MAJO</b>        | R IDENTIFI   | ED MI                         | ETABOLITES IN                          | N PLANT MATRICES –                          |
| Lettuce                       |  |                               |  |   |
| Radiolabel Position           |  |                               | [14C- Phenyl], [1                      | <sup>[4</sup> C- Pyridine]                  |
| <b>Metabolites Identified</b> |  |                               | Major Me                               | tabolites                                   |
| Harvest 1                     |  |                               | Picarbut                               | trazox                                      |
| Harvest 2                     |  |                               | Picarbut                               | trazox                                      |
| Harvest 3                     |  |                               | Picarbut                               | trazox                                      |
| Harvest 4                     |  |                               | Picarbut                               | trazox                                      |
| NATURE OF THE RE              | SIDUE IN LE  | TTUC                          | E – Tetrazole                          | PMRA # 3082003                              |
| label                         |  |                               |  |   |
| Radiolabel Position           | [Tetrazole-:   | 5- <sup>14</sup> C]- <u>r</u> | oicarbutrazox (spe                     | ecific activity: 17.64 MBq/ml)              |
| Treatment                     |  |                               |  |   |
| Test Site                     |  |                               | vn from seed were<br>nvironmental conc | e cultivated in a glass greenhouse litions. |
| T                             | Three foliar treatments, at 7-day intervals, 7, 14 and 21 days before the first sampling at rates equivalent to 100.67-105.93 g a.i./ha. |                               |  |   |
| Treatment                     | Applications to lettuce seedlings were initiated approximately 5 days post-transplant.   |                               |  |   |
| Total Rate                    | 300 g a.i./ha  |                               |  |   |
| Formulation                   | Not indicate   |                               | e study                                |   |
| Harvest                       | Lettuce leavapplication.   | ves wer                       | e collected 7 and                      | 14 days after the final spray               |
| Extraction solvents           |  |                               | (1:1; v/v) and ace                     | etonitrile                                  |
| Extraction solvents           | Accioniting  | . water                       | (1.1, v/v) and acc                     | [14C- Tetrazole]                            |
| Matrices                      | PHI (da  | ays)                          | TRR (ppm)                              |   |
| Harvest 1 – leaves            | 7  |                               |  | 5.9389                                      |
| Harvest 2 – leaves            | 14   |                               |  | 1.9793                                      |
| SUMMARY OF MAJO               |  | ED MI                         | TAROLITES IN                           |   |
| Radiolabel Position           | IN IDE: (III I   | DD WII                        | [ <sup>14</sup> C- Tetra               |   |
| Metabolites Identified        |  |                               | Major Meta                             | <b>.</b>                                    |
|                               |  |                               | Picarbutra                             |   |
| Harvest 1 - 7-day PHI         |  |                               | TZ-1H                                  |   |
| 11 (2 11 1 22                 |  |                               | Picarbutra                             |   |
| Harvest 2 - 14-day PHI        | TZ-1E  |                               |  |   |

| NATURE OF THE RI                     | ESIDUE IN C   | CUCUMBER – Phenyl   | PMRA# 2809326                   |               |  |  |
|--------------------------------------|---|---|---------------------------------|---------------|--|--|
| and Pyridinyl labels                 | In 1 x 1/1  |   |                                 |               |  |  |
| Radiolabel Position                  |   | C]-picarbutrazox (specific activity: 3.02 MBq/mg)   |                                 |               |  |  |
|                                      | [[Pyridine-4-1  | <sup>4</sup> C]-picarbutrazox (specific   | e activity: 3.01 ME             | 3q/mg)        |  |  |
| Treatment                            |   |   | 1 2 1 1                         | 1 .           |  |  |
| Test Site                            |   | ants were grown outdoor in  |                                 |               |  |  |
| Treatment                            | Three broadcast foliar applications performed with a 5-day retreatment interval at BBCH 69–70, 72 and 73 at 95–119 g a.i./ha. |   |                                 |               |  |  |
| Total Rate                           | 326-330 g a.i   | i./ha   |                                 |               |  |  |
| Formulation                          | SC formulati  | on: 10% picarbutrazox.  |                                 |               |  |  |
| Harvest                              |   | ucumber fruit were harvest<br>nd at 0 and 14 days after th  |                                 |               |  |  |
| Extraction solvents                  | Acetonitrile:   | water (1:1, v/v) and aceton   | itrile.                         |               |  |  |
| Matuiass                             | DIII (days)   | T   | RR (ppm)                        |               |  |  |
| Matrices                             | PHI (days)  | [14C- Phenyl]   | [14C-]                          | Pyridine]     |  |  |
| Harvest 1 – cucumber                 | Prior to 2 <sup>nd</sup> application  | 0.004   | 0                               | 0.001         |  |  |
| Harvest 2 – cucumber                 | 0   | 0.001   |                                 | NA            |  |  |
| Harvest 3 – cucumber                 | 10  | 0.021   | 0                               | .008          |  |  |
| <b>SUMMARY OF MAJ</b>                | OR IDENTIF  | FIED METABOLITES IN   | N CUCUMBER                      |               |  |  |
| Dadialahal Da                        | ~!4! a  | [ <sup>14</sup> C- Phen   | yl], [ <sup>14</sup> C- Pyridin | e]            |  |  |
| Radiolabel Po                        | SILIOII   | Major Metabolites   |                                 |               |  |  |
| Harvest 1 – prior to 2 <sup>nd</sup> | annliaction   | Picarbutrazox   |                                 |               |  |  |
| riaivest 1 – prior to 2              | аррисации   | TZ-1E   |                                 |               |  |  |
| Harvest 2 - 0-day                    | рні   | Picarbutrazox   |                                 |               |  |  |
| Harvest 2 6 day                      | 1111  | TZ-1E   |                                 |               |  |  |
|                                      |   | Picarbutrazox   |                                 |               |  |  |
| Harvest 2 - 10-day                   | / PHI   |   | TZ-1E                           |               |  |  |
|                                      |   | TZ-5  |                                 |               |  |  |
| NATURE OF THE RI label               | ESIDUE IN C   | CUCUMBER – Tetrazole  | PMRA # 308                      |               |  |  |
| Radiolabel Position                  |   | [Tetrazole-5- <sup>14</sup> C]-picarbut MBq/ml)   | trazox (specific ac             | tivity: 17.64 |  |  |
| Treatment                            |   |   |                                 |               |  |  |
| Test Site                            |   | Treated plants were cultiv controlled environmental   |                                 | enhouse under |  |  |
| Treatment                            |   | Cucumber plants grown in pots from seed received three foliar treatments, at 7-day intervals, 1, 8 and 15 days before the first sampling at rates equivalent to 99.05-102.93 g a.i./ha. |                                 |               |  |  |
|                                      |   | a.i./ha.  |                                 |               |  |  |
| Total Rate                           |   | a.i./ha.<br>300 g a.i./ha   |                                 |               |  |  |

|   |                 | Fruit and leaf samples were co  | llected 1. 7 and 14 days after |  |  |
|---|-----------------|---|--------------------------------|--|--|
| Harvest                                 |                 | the final spray application; however, only the fruit samples were further analysed. |                                |  |  |
| Extraction solvent                      | ra              | Acetonitrile: water (1:1; v/v) and acetonitrile                                     |                                |  |  |
| Extraction solven                       | PHI             | [14C- Tet   |                                |  |  |
| Matrices                                | (days)          | TRR (   |                                |  |  |
| Harvest 1 -                             | (uays)          | 0.14  |                                |  |  |
| cucumber                                | 1               | 0.14  | .57                            |  |  |
| Harvest 2 -                             | 8               | 0.02  | 258                            |  |  |
| cucumber                                |                 | 0.02  |                                |  |  |
| Harvest 3 -                             | 15              | 0.01  | 45                             |  |  |
| cucumber                                | -               |   |                                |  |  |
| SUMMARY OF                              | MAJOR IDENTI    | FIED METABOLITES IN LE  | TTUCE                          |  |  |
| Radiolab                                | el Position     | [ <sup>14</sup> C- Tet  | trazole]                       |  |  |
| Metabolite                              | es Identified   | Major Me  | etabolites                     |  |  |
| Harvest 1                               | - 1-day PHI     | Picarbu   |                                |  |  |
| Hamiagt 2                               | O day DIII      | Picarbu   | trazox                         |  |  |
| Harvest 2                               | - 8-day PHI     | TZ-   | 1E                             |  |  |
| Harvest 2                               | 15-day PHI      | Picarbutrazox   |                                |  |  |
| Tiaivest 2 -                            | 13-uay 1111     | TZ-1E   |                                |  |  |
| NATURE OF TH<br>Pyridinyl labels        | IE RESIDUE IN ( | CORN – Phenyl and   | PMRA # 2809329                 |  |  |
| 1 |                 | [Phenyl-U-14C]-picarbutrazox  | (specific activity: 3.02       |  |  |
|   |                 | MBq/mg)   |                                |  |  |
| Radiolabel Position                     | on              | [Pyridine-4- <sup>14</sup> C]-picarbutrazox (specific activity: 3.01                |                                |  |  |
|   |                 | MBq/mg)   | (Specific detivity: 5.01       |  |  |
| Treatment                               |                 | (112)   |                                |  |  |
| Test Site                               |                 | Corn seeds were grown to mate   | urity in a glasshouse setting. |  |  |
| Treatment                               |                 | Seed treatment  |                                |  |  |
|   |                 | 17.8 g a.i./100 kg seed or 18.6 g a.i./100 kg seed for the                          |                                |  |  |
| Total Rate                              |                 | phenyl and pyridine label, respectively.  |                                |  |  |
| Formulation                             |                 | Not indicated.  |                                |  |  |
|   |                 | Samples of corn forage were harvested at 35-day PHI                                 |                                |  |  |
|   |                 | (BBCH 14), immature corn stalks (stover), cobs and grain                            |                                |  |  |
| Harvest                                 |                 | samples were harvested at 152-day PHI (BBCH 79) and                                 |                                |  |  |
|   |                 | mature corn stalks (stover), cobs and grain samples were                            |                                |  |  |
|   |                 | harvested at 168-day PHI (BBCH 89).   |                                |  |  |
| Extraction solvent                      |                 | Acetonitrile:water (1:1 and 8:2   |                                |  |  |
| Matrices                                | PHI             | [14C- Phenyl]   | [14C- Pyridine]                |  |  |
|   | (days)          | TRR (ppm)   | TRR (ppm)                      |  |  |
| Forage                                  | 35              | 0.007   | 0.003                          |  |  |
| Immature stalks                         | 152             | 0.002   | 0.001                          |  |  |
| Immature cobs                           | 152             | <lod< td=""><td><lod< td=""></lod<></td></lod<>                                     | <lod< td=""></lod<>            |  |  |
| Immature grain                          | 152             | <lod< td=""><td><lod< td=""></lod<></td></lod<>                                     | <lod< td=""></lod<>            |  |  |

|              | environmental conditions.  Seeds treated with [tetrazole- <sup>14</sup> (23.3 g a.i./100 kg seed.  Not indicated in the study.  Forage was harvested 28 days a after the seed treatment (in other interval [PHI]) at growth stage cobs and grain were harvested at 77, at a 98-day PHI, and mature harvested at BBCH 89, at a PH  Acetonitrile:water combination | after emergence, 35 days<br>er words, a 35-day preharvest<br>BBCH 32. Immature stalks,<br>at growth stages BBCH 75-<br>e stover, cobs and grain were<br>If of 131 days.  |  |  |
|--------------|--|--|--|--|
|              | Seeds treated with [tetrazole-140 23.3 g a.i./100 kg seed.  Not indicated in the study.  Forage was harvested 28 days a after the seed treatment (in other interval [PHI]) at growth stage cobs and grain were harvested a 77, at a 98-day PHI, and mature   | after emergence, 35 days<br>er words, a 35-day preharvest<br>BBCH 32. Immature stalks,<br>at growth stages BBCH 75-<br>e stover, cobs and grain were   |  |  |
|              | Seeds treated with [tetrazole-140 23.3 g a.i./100 kg seed.  Not indicated in the study.  |  |  |  |
|              | Seeds treated with [tetrazole-14]  | C]-picarbutrazox at a rate of  |  |  |
|              |  | O1 : 1 /   |  |  |
|              | The seeds were sown in sandy loam soil in pots and plants were grown to maturity in a glasshouse under controlled environmental conditions.  |  |  |  |
|              | The seeds were sown in sandy   | loam soil in pots and plants   |  |  |
|              | MBq/ml)  | · -  |  |  |
| RESIDUE IN ( |  | PMRA # 3082031<br>x (specific activity: 5.2  |  |  |
| e            | TZ-<br>TZ-5-   | -Glc   |  |  |
| dentified    | Major Metabolites  |  |  |  |
| Position     | [14C- Phenyl], [1  | <sup>14</sup> C- Pyridine]   |  |  |
|              |  |  |  |  |
|              |  | 0.001  |  |  |
|              |  | 0.001<br><lod< td=""></lod<>   |  |  |
| (            | osition<br>lentified   | 168 0.001  168 0.001  JOR IDENTIFIED METABOLITES IN COrosition [14C- Phenyl], [14 |  |  |

# **Proposed Metabolic Scheme in Plants**

# FREEZER STORAGE STABILITY IN PLANT MATRICES PMRA# 2808246 and 3082016

| Tested Matrices          | Analytes                           | Tested<br>Intervals<br>(months)  | Demonstrated Stability & Temperature (°C) | Category        |
|--------------------------|------------------------------------|----------------------------------|---|-----------------|
| Corn grain; radish root  | Picarbutrazox and the metabolites  | 0, 1, 3, 6, 9, 12<br>and 13.4-14 | 14 months at -20°C                        | High-starch     |
| Leaf lettuce             | TZ-1E, TZ-2-β-Glc, TZ-5 and TZ-    | months                           | 13.4 months at - 20°C                     | High-water      |
| Dry pinto beans          | 5-Glc                              |                                  | 13.4 months at - 20°C                     | High-protein    |
| Orange fruit             |                                    |                                  | 13.4 months at - 20°C                     | High-acid       |
| Canola seed              |                                    |                                  | 13.5 months at - 20°C                     | High-oil        |
| Wheat straw              |                                    |                                  | 12.2 months at ≤-18°C                     | Dry commodities |
| Radish root; wheat grain | Tetrazole-derived metabolites TT-1 | 0, 1, 3, 6, and ~12 months       | 12.0–12.2 months at ≤-18°C                | High-starch     |

| Lettuce; radish tops | and TT-3 |                             | 12.4 months at ≤-18°C | High-water      |
|----------------------|----------|-----------------------------|-----------------------|-----------------|
| Barley straw         |          | 0, 1, 3, 6, and 12.4 months | 14 months at -20°C    | Dry commodities |

The freezer storage stability data indicate that residues of picarbutrazox and the metabolites TZ-1E, TZ-2- $\beta$ -Glc, TZ-5 and TZ-5-Glc are stable at -20°C for 13.4 months in the five OECD crop commodity categories. Therefore, these residues are stable in all crops and processed commodities for up to 13.4 months in frozen storage.

The freezer storage stability data for the tetrazole-derived metabolites indicate that TT-1 and TT-3 are stable at ≤-18°C for 12.0 months in high-starch (radish root and wheat grain), high-water (lettuce and radish tops) and dry commodities (barley straw) in frozen storage.

### CROP FIELD TRIALS AND RESIDUE DECLINE ON SOYBEAN PMRA# 2809334

Field trials were conducted in 2015–2016 in Canada and the United States. Trials were conducted in growing Regions 2 (2 trials), 4 (3 trials), and 5 (16 trials) for a total of 21 trials. Picarbutrazox FS, a flowable suspension containing 400 g a.i./L, was applied to soybean seeds.

| Commodity | Total Application Rate  | PHI    | Analyte       |    |         | Residu  | e Levels (pp | om)   |      |
|-----------|-------------------------|--------|---------------|----|---------|---------|--------------|-------|------|
| ·         | (g a.i./100<br>kg seed) | (days) | v             | n  | LAFT    | HAFT    | Median       | Mean  | SDEV |
| Forage    | 9.022                   | 19–55  |               | 21 | < 0.005 | < 0.005 | 0.005        | 0.005 | 0    |
| Hay       | 8.932–<br>12.986        | 46–73  | Picarbutrazox | 21 | < 0.005 | < 0.005 | 0.005        | 0.005 | 0    |
| Seed      | 12.900                  | 92–154 |               | 21 | < 0.005 | < 0.005 | 0.005        | 0.005 | 0    |

n = number of independent trials.

# CROP FIELD TRIALS AND RESIDUE DECLINE ON CORN (FIELD, SWEET AND POPCORN)

PMRA # 2809336

Field trials were conducted in 2015–2016 in Canada and the United States. Three popcorn trials were conducted in the Growing Regions 5 (2 trials) and 8 (1 trial). Five sweet corn trials were conducted in Growing Regions 1 (1 trial), 3 (1 trial), 10 (1 trial), 11 (1 trial), and 12 (1 trial). Nineteen field corn trials were conducted in Growing Regions 1 (1 trial), 2 (1 trial), 5 (16 trials), and 6 (1 trial). Picarbutrazox FS (A20597B), a flowable suspension containing 400 g a.i./L, was applied to field corn, sweet corn and popcorn seeds.

|            | Total  |               |               | Residue Levels (ppm) |         |         |        |       |      |
|------------|--|---------------|---------------|----------------------|---------|---------|--------|-------|------|
| Commodity  | Application<br>Rate<br>(g a.i./100<br>kg seed) | PHI<br>(days) | Analyte       | n                    | LAFT    | HAFT    | Median | Mean  | SDEV |
|            | Sweet Corn (including Simulated Sweet Corn)    |               |               |                      |         |         |        |       |      |
| Forage     | 0.000  | 71–95         |               | 21                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |
| Hay        | 8.932–<br>12.986                               | 91–110        | Picarbutrazox | 21                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |
| Seed       | 12.900   | 60–90         |               | 21                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |
| Field Corn |  |               |               |                      |         |         |        |       |      |
| Forage     |  | 84–140        |               | 19                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |
| Grain      | 8.9–11.9                                       | 118–154       | Picarbutrazox | 19                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |
| Stover     |  | 116-154       |               | 19                   | < 0.005 | < 0.005 | 0.005  | 0.005 | 0    |

| Grain         10.7-11.1         127-147         Picarbutrazox         3         <0.005 | Popcorn |           |         |               |   |         |         |       |       |   |
|--|---------|-----------|---------|---------------|---|---------|---------|-------|-------|---|
| Stover   10.7-11.1   127-147   Picarounazox   3   <0.005   <0.005   0.005   0.005   0  | Grain   | 10.7.11.1 | 127 147 | Diagrhytragay | 3 | < 0.005 | < 0.005 | 0.005 | 0.005 | 0 |
|  | Stover  | 10.7-11.1 | 12/-14/ | Picarbutrazox | 3 | < 0.005 | < 0.005 | 0.005 | 0.005 | 0 |

#### PROCESSED FOOD AND FEED - SOYBEANS

PMRA# 3164948

Processing studies were conducted in 2 growing regions using Picarbutrazox FS (A20597B; guarantee: 400 g a.i./L/flowable suspension) at 29.420 & 30.237 g a.i./100 kg seed (~12-fold of proposed maximum seed treatment use rate) in/on soybean seed. Adequate storage stability data are available on diverse crop types to support the storage intervals of the samples. Samples were analyzed using a validated analytical method. Picarbutrazox residues were all <LOQ (<0.005 ppm) in bulk soybean seed. As such, no processing was initiated.

### PROCESSED FOOD AND FEED – FIELD CORN PMRA# 2809336

Processing studies were conducted in 2 growing regions using Picarbutrazox FS (A20597B; guarantee: 400 g a.i./L/flowable suspension) at 27.967-38.818 g a.i./100 kg seed (~5.6-7.8-fold of proposed maximum seed treatment use rate) in/on corn seed. Adequate storage stability data are available on diverse crop types to support the storage intervals of the samples. Samples were analyzed using a validated analytical method. Picarbutrazox residues were all <LOQ (<0.005 ppm) in bulk field corn seed. As such, no processing was initiated.

| in bulk field com seed. As such, no processing was initiated. |            |  |  |  |  |  |  |
|---|------------|--|--|--|--|--|--|
| CONFINED ACCUMUL<br>Lettuce, radish and wheat                 |            |  |  |  |  |  |  |
| Radiolabel Position   | [Phenyl-U  | -14C]-picarbutrazox (specific<br>4-14C]-picarbutrazox (specifi | activity: 3.02 MBq/mg)<br>c activity: 3.01 MBq/mg) |  |  |  |  |
| Treatment   |            |  |  |  |  |  |  |
| Test Site   | All plants | All plants were grown outdoors in above ground wooden boxes.   |  |  |  |  |  |
| Soil Type   | Sandy loa  |  |  |  |  |  |  |
| Treatment   |            | was treated at a rate of 1033 gre planted at PBIs of 30, 120 a | •  |  |  |  |  |
| Formulation   | 10% suspe  | ension concentrate (SC)  | -  |  |  |  |  |
| Extraction solvents   | Acetonitri | le:water (1:1, v/v) and aceton                                 | itrile   |  |  |  |  |
| Matriaga  | PBI        | [ <sup>14</sup> C-Phenyl]                                      | [14C-Pyridine]                                     |  |  |  |  |
| Matrices  | (days)     | TRR (ppm)  | TRR (ppm)  |  |  |  |  |
|   | 30         | 0.349  | 0.037  |  |  |  |  |
| Immature lettuce  | 120        | 0.090  | 0.040  |  |  |  |  |
|   | 275        | 0.067  | 0.012  |  |  |  |  |
|   | 30         | 0.173  | 0.036  |  |  |  |  |
| Mature lettuce  | 120        | 0.069  | 0.025  |  |  |  |  |
|   | 275        | 0.049  | 0.008  |  |  |  |  |
|   | 30         | 0.989  | 0.089  |  |  |  |  |
| Radish tops   | 120        | 0.063  | 0.008  |  |  |  |  |
|   | 275        | 0.051  | 0.017  |  |  |  |  |
|   | 30         | 0.157  | 0.144  |  |  |  |  |
| Radish roots  | 120        | 0.033  | 0.035  |  |  |  |  |
|   | 275        | 0.016  | 0.017  |  |  |  |  |

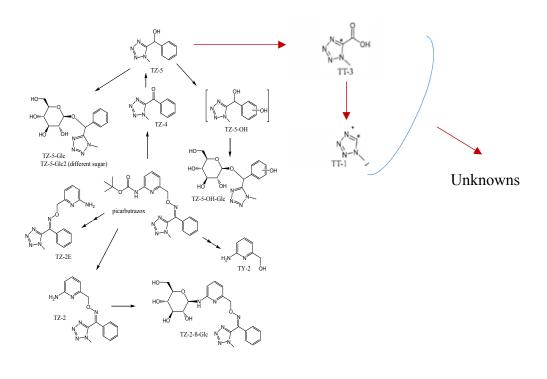
|              | 30  | 1.019 | 0.210 |
|--------------|-----|-------|-------|
| Wheat forage | 120 | 0.251 | 0.027 |
|              | 275 | 0.051 | 0.027 |
|              | 30  | 1.750 | 0.735 |
| Wheat hay    | 120 | 0.273 | 0.091 |
|              | 275 | 0.203 | 0.062 |
|              | 30  | 1.646 | 0.838 |
| Wheat straw  | 120 | 0.523 | 0.129 |
|              | 275 | 0.377 | 0.088 |
|              | 30  | 0.070 | 0.039 |
| Wheat grain  | 120 | 0.045 | 0.028 |
|              | 275 | 0.036 | 0.022 |

| Summary of Major Identified Metabolites in Rotated Crops   |   |                               |                               |  |  |  |  |  |
|--|---|-------------------------------|-------------------------------|--|--|--|--|--|
| Plant-back Intervals   | 1st Rotation  | 2nd Rotation                  | 3rd Rotation                  |  |  |  |  |  |
| (PBI)  | (30-day PBI)  | (120-day PBI)                 | (375-day PBI)                 |  |  |  |  |  |
| Radiolabel Position [14C-Phenyl], [14C-Pyridine]   |   |                               |                               |  |  |  |  |  |
| <b>Metabolites Identified</b>  | Major Metabolites                                     |                               |                               |  |  |  |  |  |
| Immature lettuce   | TZ-5<br>TZ-5-Gle<br>TZ-5-Gle2<br>TZ-2-β-Gle           | TZ-5<br>TZ-5-Glc              | TZ-5<br>TZ-5-Glc<br>TZ-5-Glc2 |  |  |  |  |  |
| Mature lettuce   | TZ-5<br>TZ-5-Glc<br>TZ-5-Glc2                         | TZ-5<br>TZ-5-Glc<br>TZ-5-Glc2 | TZ-5<br>TZ-5-Glc<br>TZ-5-Glc2 |  |  |  |  |  |
| Radish tops  | TZ-5<br>TZ-5-Glc<br>TZ-2-β-Glc                        | TZ-5                          | TZ-5                          |  |  |  |  |  |
| Radish roots None TZ-5   |   |                               |                               |  |  |  |  |  |
| Wheat forage   | TZ-5<br>TZ-5-Glc<br>TZ-2-β-Glc                        | TZ-5<br>TZ-5-Glc              | TZ-5<br>TZ-5-Glc              |  |  |  |  |  |
| Wheat hay  | TZ-5 TZ-5-Glc TZ-2-β-Glc TZ-2-β-Glc TZ-5-Glc TZ-5-Glc |                               |                               |  |  |  |  |  |
| Wheat straw  | TZ-5<br>TZ-5-Gle TZ-5 TZ-5-Gle                        |                               |                               |  |  |  |  |  |
| Wheat grain  | Wheat grain TZ-5 None None                            |                               |                               |  |  |  |  |  |
| CONFINED ACCUMULATION IN ROTATIONAL CROPS – Lettuce, radish and wheat  PMRA# 3082004                 |   |                               |                               |  |  |  |  |  |
| Radiolabel Position [Tetrazole-5- <sup>14</sup> C]picarbutrazox (specific activity 1.98-2.23 MBq/mg) |   |                               |                               |  |  |  |  |  |
| Treatment  |   |                               |                               |  |  |  |  |  |
| Test Site  | Rotational crops were gr                              | own outdoors in wooder        | n boxes (1 m <sup>2</sup> ).  |  |  |  |  |  |
| Soil Type  | Sandy loam  |                               |                               |  |  |  |  |  |

| Treatment                 | Bare soil was treated at a radish and wheat were p |                                  |                 |  |  |  |  |
|---------------------------|--|----------------------------------|-----------------|--|--|--|--|
| Formulation               | 10% suspension concent                             |                                  | o and 275 days. |  |  |  |  |
| Extraction solvents       | Acetonitrile:water (1:1,                           |                                  |                 |  |  |  |  |
|                           | PBI  |                                  | trazole]        |  |  |  |  |
| Matrices                  | (days)   | TRR                              |                 |  |  |  |  |
|                           | 30   | 1.021                            |                 |  |  |  |  |
| Immature lettuce          | 120  | 0.776                            |                 |  |  |  |  |
|                           | 275  | 0.198                            |                 |  |  |  |  |
|                           | 30   | 0.5                              | 549             |  |  |  |  |
| Mature lettuce            | 120  | 0.6                              | 513             |  |  |  |  |
|                           | 275  | 0.1                              | .07             |  |  |  |  |
|                           | 30   | 0.7                              | <u>'11</u>      |  |  |  |  |
| Radish tops               | 120  | 0.4                              | 189             |  |  |  |  |
|                           | 275  |                                  | 255             |  |  |  |  |
|                           | 30   | 0.5                              | 555             |  |  |  |  |
| Radish roots              | 120  | 0.3                              | 375             |  |  |  |  |
|                           | 275  | 0.3                              | 313             |  |  |  |  |
|                           | 30   |                                  | 738             |  |  |  |  |
| Wheat forage              | 120  | 1.7                              | 762             |  |  |  |  |
|                           | 275  | 0.693                            |                 |  |  |  |  |
|                           | 30   | 5.0                              |                 |  |  |  |  |
| Wheat hay                 | 120  | 4.299                            |                 |  |  |  |  |
|                           | 275  |                                  | 240             |  |  |  |  |
|                           | 30   |                                  | .65             |  |  |  |  |
| Wheat straw               | 120  | 3.5                              |                 |  |  |  |  |
|                           | 275  |                                  | 524             |  |  |  |  |
|                           | 30   |                                  | 376             |  |  |  |  |
| Wheat grain               | 120  |                                  | 97              |  |  |  |  |
| 0                         | 275  |                                  | 262             |  |  |  |  |
|                           | ry of Major Identified Mo                          |                                  |                 |  |  |  |  |
| Plant-back Intervals      | 1st Rotation                                       | 2nd Rotation                     | 3rd Rotation    |  |  |  |  |
| (PBI) Radiolabel Position | (30 day PBI)                                       | (120 day PBI)<br>[14C-Tetrazole] | (375 day PBI)   |  |  |  |  |
| Metabolites Identified    |  | Major Metabolites                |                 |  |  |  |  |
|                           |  |                                  | TT-1            |  |  |  |  |
| Immature lettuce          | TT-3   | TT-3                             | TT-3            |  |  |  |  |
| Mature lettuce            | TT-3   | TT-3                             | TT-3            |  |  |  |  |
|                           | TT-3   |                                  |                 |  |  |  |  |
| Radish tops               | TZ-5   | TT-3                             | TT-3            |  |  |  |  |
|                           | UKC  | UKA                              | UKA             |  |  |  |  |
|                           |  | TT-3                             | TT-3            |  |  |  |  |
| Radish roots              | TT-3   | UKA                              | UKA             |  |  |  |  |
|                           |  |                                  | RT20.5          |  |  |  |  |

| Wheat forego | TT-3 | TT-3        | TT-3        |
|--------------|------|-------------|-------------|
| Wheat forage | 11-3 | UKA         | UKA         |
|              | TT-1 | TT-3        |             |
| Wheat hay    | TT-3 | UKA         | TT-1        |
| -            | 11-3 | RT39.5-39.8 |             |
|              |      | TT-1        | TT-1        |
| Wheat straw  | TT-1 | TT-3        | TT-3        |
| wheat straw  | TT-3 | UKA         | UKA         |
|              |      | RT39.2-39.8 | RT39.2-39.8 |
|              | TT-3 | TT-1        | TT-3        |
| Wheat grain  | UKA  | TT-3        | UKA         |
|              | UNA  | UKA         | RT21.8      |

# **Proposed Metabolic Scheme in Rotational Crops**



## RESIDUE DATA IN ROTATIONAL CROPS PMRA # 2808254

Eighteen trials (six each for radish, lettuce and wheat) were conducted during the 2015 and 2016 growing seasons in growing regions 1, 2, 10 and 11. One broadcast application was made to bare soil with NF-171 10 SC at a rate of 0.272–0.307 g a.i./ha. Adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Samples were analyzed using a validated analytical method.

|                   | Total                               |             | Resi | due Leve | ls (ppm p | icarbutra | zox equi | valents) |
|-------------------|-------------------------------------|-------------|------|----------|-----------|-----------|----------|----------|
| Commodity         | Application<br>Rate<br>(kg a.i./ha) | PBI (days)  | n    | LAFT     | HAFT      | Median    | Mean     | SDEV     |
| Picarbutrazo      | OX                                  |             |      |          |           |           |          |          |
|                   |                                     | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Lettuce<br>leaves | 0.272-0.303                         | 115–<br>119 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
| icaves            |                                     | 357–<br>364 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
|                   |                                     | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Radish tops       |                                     | 115–<br>119 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
|                   | 0.270.0.207                         | 357–<br>364 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
|                   | 0.279-0.307                         | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Radish roots      |                                     | 115–<br>119 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
|                   |                                     | 357–<br>364 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
|                   |                                     | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Wheat             |                                     | 115–<br>119 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| forage            |                                     | 357–<br>364 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
|                   |                                     | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Wheat hay         |                                     | 115–<br>119 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
|                   | 0.273-0.305                         | 357–<br>364 | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
|                   | 0.2/3-0.303                         | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Wheat             |                                     | 115–<br>119 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
| Suaw              | Straw                               | 357–<br>364 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
|                   |                                     | 28          | 2    | < 0.005  | < 0.005   | 0.005     | 0.005    | NA       |
| Wheat<br>Grain    |                                     | 115–<br>119 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |
| Giain             |                                     | 357–<br>364 | 2    | <0.005   | < 0.005   | 0.005     | 0.005    | NA       |

| TZ-2-β-Glc        |             |             |          |         |             |       |             |    |
|-------------------|-------------|-------------|----------|---------|-------------|-------|-------------|----|
| •                 |             | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Lettuce<br>leaves | 0.272-0.303 | 115–<br>119 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| icaves            |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Radish tops       |             | 115–<br>119 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   | 0.279-0.307 | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   | 0.279 0.307 | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Radish roots      |             | 115–<br>119 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Wheat<br>forage   |             | 115–<br>119 | 2        | < 0.004 | <0.004      | 0.004 | 0.004       | NA |
| Totage            |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Wheat hay         |             | 115–<br>119 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   | 0.273-0.305 | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Wheat<br>Straw    | 0.270       | 115–<br>119 | 2        | <0.004  | < 0.004     | 0.004 | 0.004       | NA |
| Silaw             |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
|                   |             | 28          | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Wheat<br>Grain    |             | 115–<br>119 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| Giani             |             | 357–<br>364 | 2        | < 0.004 | < 0.004     | 0.004 | 0.004       | NA |
| TZ-5              | <u> </u>    |             | <u> </u> | T -     | <del></del> |       | · · · · · · |    |
|                   |             | 28          | 2        | < 0.011 | < 0.011     | 0.011 | 0.011       | NA |
| Lettuce<br>leaves | 0.272-0.303 | 115–<br>119 | 2        | <0.011  | < 0.011     | 0.011 | 0.011       | NA |
| leaves            |             | 357–<br>364 | 2        | < 0.011 | < 0.011     | 0.011 | 0.011       | NA |

|                   |             | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
|-------------------|-------------|-------------|---|---------|---------|-------|-------|----|
| Radish tops       |             | 115–<br>119 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| _                 | 0.270.0.207 | 357–<br>364 | 2 | < 0.011 | <0.011  | 0.011 | 0.011 | NA |
|                   | 0.279–0.307 | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Radish roots      |             | 115–<br>119 | 2 | < 0.011 | <0.011  | 0.011 | 0.011 | NA |
|                   |             | 357–<br>364 | 2 | < 0.011 | <0.011  | 0.011 | 0.011 | NA |
|                   |             | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Wheat<br>forage   |             | 115–<br>119 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| 1014450           |             | 357–<br>364 | 2 | <0.011  | < 0.011 | 0.011 | 0.011 | NA |
|                   |             | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Wheat hay         |             | 115–<br>119 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
|                   | 0.273-0.305 | 357–<br>364 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
|                   |             | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Wheat<br>Straw    |             | 115–<br>119 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Suaw              |             | 357–<br>364 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
|                   |             | 28          | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Wheat<br>Grain    |             | 115–<br>119 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| Giaili            |             | 357–<br>364 | 2 | < 0.011 | < 0.011 | 0.011 | 0.011 | NA |
| TZ-5-Glc          | 1           |             | T | T       |         |       | 1     |    |
|                   |             | 28          | 2 | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Lettuce<br>leaves | 0.272-0.303 | 115–<br>119 | 2 | <0.006  | < 0.006 | 0.006 | 0.006 | NA |
| 104 703           |             | 357–<br>364 | 2 | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
|                   |             | 28          | 2 | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Radish tops       | 0.279-0.307 | 115–<br>119 | 2 | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| 1                 |             | 357–<br>364 | 2 | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |

|                |             | 28          | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
|----------------|-------------|-------------|---------|---------|---------|-------|-------|----|
| Radish roots   | dish roots  | 115–<br>119 | 2       | < 0.006 | <0.006  | 0.006 | 0.006 | NA |
|                | 357–<br>364 | 2           | < 0.006 | < 0.006 | 0.006   | 0.006 | NA    |    |
|                |             | 28          | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Wheat          |             | 115–<br>119 | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| forage         |             | 357–<br>364 | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
|                |             | 28          | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Wheat hay      |             | 115–<br>119 | 2       | <0.006  | <0.006  | 0.006 | 0.006 | NA |
|                | 0.272 0.205 | 357–<br>364 | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
|                | 0.273-0.305 | 28          | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Wheat<br>Straw |             | 115–<br>119 | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Suaw           |             | 357–<br>364 | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
|                |             | 28          | 2       | < 0.006 | < 0.006 | 0.006 | 0.006 | NA |
| Wheat          |             | 115–<br>119 | 2       | <0.006  | < 0.006 | 0.006 | 0.006 | NA |
| Grain          |             | 357–<br>364 | 2       | <0.006  | < 0.006 | 0.006 | 0.006 | NA |

Values based on per-trial averages. For computation, values <LOQ are assumed to be at the LOQ.

n = number of independent field trials. NA = Not applicable

### RESIDUE DATA IN ROTATIONAL CROPS

#### PMRA # 2809338/2808252

Eighteen trials (six each for radish, lettuce and winter wheat) were conducted during the 2015 growing season in growing regions 1, 5, 10, and 11. One broadcast application was made to bare soil with Picarbutrazox FS (containing 400 g a.i./L) at a rate of 0.019–0.021 kg a.i./ha. Adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Samples were analyzed using a validated analytical method.

|               | Total                               |            | Resi | due Level | ls (ppm p | icarbutra | zox equi | valents) |
|---------------|-------------------------------------|------------|------|-----------|-----------|-----------|----------|----------|
| Commodity     | Application<br>Rate<br>(kg a.i./ha) | PBI (days) | n    | LAFT      | HAFT      | Median    | Mean     | SDEV     |
| Picarbutrazox |                                     |            |      |           |           |           |          |          |
| Lettuce       | 0.019-0.021                         | 0          | 3    | < 0.005   | < 0.005   | 0.005     | 0.005    | 0        |
| leaves        | 0.019-0.021                         | 28–31      | 3    | < 0.005   | < 0.005   | 0.005     | 0.005    | 0        |
| Dadiah tana   |                                     | 0          | 3    | < 0.005   | < 0.005   | 0.005     | 0.005    | 0        |
| Radish tops   | 0.019-0.021                         | 28-31      | 3    | < 0.005   | < 0.005   | 0.005     | 0.005    | 0        |
| Radish roots  |                                     | 0          | 3    | < 0.005   | < 0.005   | 0.005     | 0.005    | 0        |

| 1           | 00.01   |  | .0.005   | 0.005      | 0.005  | 0.005      | 0          |
|-------------|---|--|--|------------|--|------------|------------|
|             | 1   |  |  |            |  |            | 0          |
|             |   |  |  |            |  |            | 0          |
|             |   |  |  |            |  |            | 0          |
|             | <b></b>   |  |  |            |  |            | 0          |
| 0.01-0.021  |   |  |  |            |  |            | 0          |
| 0.01 0.021  | _   |  |  |            |  |            | 0          |
|             | 28–31   |  | < 0.005  | < 0.005    | 0.005  | 0.005      | 0          |
|             | 0   |  | < 0.005  | < 0.005    | 0.005  | 0.005      | 0          |
|             | 28–31   | 3  | < 0.005  | < 0.005    | 0.005  | 0.005      | 0          |
|             |   |  |  |            |  | ,          |            |
| 0.019_0.021 | 0   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
| 0.017-0.021 | 28–31   |  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 0   |  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
| 0.010.0021  | 28–31   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
| 0.019-0.021 | 0   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 28–31   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 0   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 28-31   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 0   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
| 0.010.0.021 | 28–31   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
| 0.019-0.021 | 0   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 28–31   | 3  | < 0.004  | < 0.004    | 0.004  | 0.004      | 0          |
|             | 0   |  |  |            |  |            | 0          |
|             | 28–31   | 3  |  |            |  |            | 0          |
|             | l   |  |  |            |  |            |            |
| 0.010.0.021 | 0   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
| 0.019-0.021 | 28-31   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
|             | 0   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
| 0.010.0001  | 28-31   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
| 0.019-0.021 | 0   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
|             | 28–31   | 3  | < 0.011  | < 0.011    | 0.011  | 0.011      | 0          |
|             | 1   |  |  |            |  | 1          | 0          |
|             |   |  |  |            |  | 1          | 0          |
|             | 0   |  |  |            |  | 1          | 0          |
|             |   |  |  |            |  |            | 0          |
| 0.019–0.021 |   |  |  |            |  | 1          | 0          |
|             |   |  |  |            |  | 1          | 0          |
|             |   |  |  |            |  |            | 0          |
|             | <b></b>   |  |  |            |  |            | 0          |
|             |   | <u>J</u>   | 0.011  | 0.011      | 0.011  | 0.011      | <u> </u>   |
|             | 0   | 3  | < 0.006  | < 0.006    | 0.006  | 0.006      | 0          |
|             |   |  |  | 0.000      | 0.000  | 0.000      | U          |
| 0.019-0.021 | 28-31   | 3  | < 0.006  | < 0.006    | 0.006  | 0.006      | 0          |
|             | 0.019-0.021  0.019-0.021  0.019-0.021  0.019-0.021  0.019-0.021 | $ \begin{array}{r} 0\\28-31\\0\\28-31\\0\\28-31\\\\ 0.019-0.021\\\\ 0.019-0.021\\\\ 0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\28-31\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0\\0$ | $0.01-0.021 \begin{vmatrix} 0 & 3 \\ 28-31 & 3 \\ 0 & 3 \\ 28-31 & 3 \\ 0 & 3 \\ 28-31 & 3 \end{vmatrix}$ $0.019-0.021 \begin{vmatrix} 0 & 3 \\ 28-31 & 3 \\ 0 & 3 \\ 28-31 & 3 \end{vmatrix}$ $0.019-0.021 \begin{vmatrix} 0 & 3 \\ 28-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\ 0 & 3 \\ 38-31 & 3 \\$ | 0.01-0.021 | 0.01-0.021 = 0.019-0.021 = 0 | 0.01-0.021 | 0.01-0.021 |

|               |             | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
|---------------|-------------|-------|---|---------|---------|-------|-------|---|
| Radish roots  |             | 0     | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Kauisii 100ts |             | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat         |             | 0     | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| forage        |             | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat have    |             | 0     | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat hay     | 0.019-0.021 | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat atmaxx  | 0.019-0.021 | 0     | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat straw   |             | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat grain   |             | 0     | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |
| Wheat grain   |             | 28-31 | 3 | < 0.006 | < 0.006 | 0.006 | 0.006 | 0 |

Values based on per-trial averages. For computation, values <LOQ are assumed to be at the LOQ.

n = number of independent field trials.

### RESIDUE DATA IN ROTATIONAL CROPS

PMRA # 3082033

Eight trials (two trials on leafy vegetables, and three trials each on root vegetables and cereal grains) were conducted during the 2019 growing season in growing regions 4 (2 trials), 7 (3 trials), and 11 (trials). One broadcast application was made to bare soil with Picarbutrazox FS (containing 400 g a.i./L) at a rate of 0.020 kg a.i./ha. Adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Samples were analyzed using a validated analytical method.

|  | Total                               |            | Residue Levels (ppm picarbutrazox equivalents) |         |         |        |       | valents) |
|--|-------------------------------------|------------|--|---------|---------|--------|-------|----------|
| Commodity  | Application<br>Rate<br>(kg a.i./ha) | PBI (days) | n  | LAFT    | HAFT    | Median | Mean  | SDEV     |
| TT-1   |                                     |            |  |         |         |        |       |          |
| Lettuce and spinach; and wheat grain                             | 0.020                               | 26–31      | 2  | <0.024  | <0.024  | 0.024  | 0.024 | NA       |
| Radish and<br>turnip root<br>and tops;<br>and<br>wheat<br>forage | 0.020                               | 26–31      | 3  | <0.024  | <0.024  | 0.024  | 0.024 | 0        |
| Wheat hay  | 0.020                               | 26–31      | 2  | < 0.024 | < 0.028 | 0.026  | 0.026 | NA       |
| Wheat straw  | 0.020                               | 26–31      | 2  | < 0.024 | < 0.024 | 0.024  | 0.024 | NA       |
| TT-3   | TT-3                                |            |  |         |         |        |       |          |
| Lettuce and spinach; and wheat grain                             | 0.020                               | 26–31      | 2  | <0.016  | <0.016  | 0.016  | 0.016 | NA       |

| Radish and<br>turnip root<br>and tops;<br>and<br>wheat<br>forage | 0.020 | 26–31 | 3 | <0.016  | <0.016 | 0.016 | 0.016 | 0  |
|--|-------|-------|---|---------|--------|-------|-------|----|
| Wheat hay  | 0.020 | 26–31 | 2 | < 0.016 | 0.042  | 0.029 | 0.029 | NA |
| Wheat straw  | 0.020 | 26–31 | 2 | < 0.016 | 0.023  | 0.020 | 0.020 | NA |

Values based on per-trial averages. For computation, values <LOQ are assumed to be at the LOQ.

n = number of independent field trials. NA = Not applicable

Based on the results of the field accumulation studies, a plant-back interval of 30 days is required for all other crops that are not on the VAYANTIS Seed Treatment label.

Table 9 Food residue chemistry overview of metabolism studies and risk assessment

| PLANT STUDI  | ES   |
|--|--|
| RESIDUE DEFINITION FOR ENFORCEMENT<br>Primary crops (cucumber (foliar treatment),<br>lettuce (foliar treatment) and corn (seed<br>treatment))<br>Rotational crops (lettuce, radish, wheat, spinach,<br>turnip) | Picarbutrazox  |
| RESIDUE DEFINITION FOR RISK<br>ASSESSMENT<br>Primary crops   | Picarbutrazox and TZ-1E Picarbutrazox and TZ-5                                   |
| Rotational crops   |  |
| METABOLIC PROFILE IN DIVERSE CROPS   | Similar in cucumber and lettuce (foliar applications) and corn (seed treatment). |
| ANIMAL STUD  | IES  |
| ANIMALS  | Ruminant and Poultry   |
| RESIDUE DEFINITION FOR ENFORCEMENT   | Picarbutrazox  |
| RESIDUE DEFINITION FOR RISK ASSESSMENT   | Picarbutrazox  |
| METABOLIC PROFILE IN ANIMALS (goat, hen, rat)  | The metabolic profile is similar in the animals investigated.                    |
| FAT SOLUBLE RESIDUE  | Yes  |

| DIETARY RISK FROM FOOD AND DRINKING WATER   |                        |             |                                    |  |
|---|------------------------|-------------|------------------------------------|--|
|   | POPULATION             | % of ACCEPT | TED RISK<br>TABLE DAILY<br>E (ADI) |  |
|   |                        | Food Alone  | Food and<br>Drinking Water         |  |
|   | All infants < 1 year   | 0.9         | 1.7                                |  |
| Basic chronic (cancer and non-cancer) dietary exposure analysis  ADI = 0.02 mg/kg bw/day  Estimated chronic drinking water concentration = 2.1 µg | Children 1–2<br>years  | 2.7         | 3.0                                |  |
|   | Children 3 to 5 years  | 1.6         | 1.9                                |  |
|   | Children 6–12<br>years | 1.0         | 1.1                                |  |
| a.i. L  | Youth 13–19 years      | 0.5         | 0.7                                |  |
|   | Adults 20–49 years     | 0.4         | 0.6                                |  |
|   | Adults 50+ years       | 0.4         | 0.5                                |  |
|   | Females 13-49<br>years | 0.3         | 0.6                                |  |
|   | Total population       | 0.6         | 0.8                                |  |

Table 10 Picarbutrazox and its environmental transformation products identified in laboratory and field dissipation studies

| Chemical structure and chemical name    | Study type         |       | Maximum<br>%AR (day) | Final %AR by study end (study length in days) |
|---|--------------------|-------|----------------------|---|
| Picarbutrazox                           | Hydrolysis         |       | 102%                 | 40.7%   |
| (technical grade active ingredient)     | (pH 4, 7 and       | d 9)  | (0)                  | (30)  |
|   | Soil photolysis    |       | 106.1% (0)           | 63.8%<br>(27.83)                              |
| NOW | Aqueous photolysis | Water | 101.9% (0)           | 0.4%<br>(30)                                  |
| N'N-N                                   |                    | рН 9  | 101.9% (0)           | 0.3% (26.9)                                   |

| Chemical structure and chemical name   | , ,,                    | Study type |                         | Final %AR<br>by study end<br>(study length<br>in days)                                |  |
|--|-------------------------|------------|-------------------------|---|--|
| CAS# 500207-04-5   | Aerobic soi             | il         | 98.5%<br>(0)            | 25.8%<br>(120)  |  |
| CAS or chemical name:  | Anaerobic               | soil       | 98.3%<br>(0)            | 38.5<br>(120)   |  |
| Carbamic acid, N-[6-[[[(Z)-[(1-methyl-1H-tetrazol-5-                             | Aerobic aqu             | uatic      | 99.2%                   | 33.7%<br>(100)  |  |
| yl)phenylmethylene]amino]oxy]methyl]-<br>2-pyridinyl]-, 1,1-dimethylethyl ester  | Anaerobic               | aquatic    | 98.1%<br>(0)            | 11.0%<br>(100)  |  |
| Common name: Picarbutrazox  Synonyms: NF-171, DS-7097                            | Field studies           |            | 78.2% (0)               | 16.8% (366) Combined picarbutrazox & TZ-1E 11.3% (731) Combined picarbutrazox & TZ-1E |  |
|  | Koc                     |            | 3741±1550 (1530 - 5849) |   |  |
| MAJOR (>10%) TRANSFORMATION  | PRODUCT                 | ΓS         |                         |   |  |
| TZ-1E<br>(E-Isomer of picarbutrazox)   | Hydrolysis (pH 4, 7 and | d 9)       | Not detected            | Not detected  |  |
|  | Soil photolysis         |            | 35.6%<br>(29.9)         | 35.6%<br>(29.9)   |  |
| N H O K  | Aqueous<br>Photolysis   | Water      | 76.3%<br>(0.75)         | 1.9%  |  |
|  |                         | рН 9       | 76.8%<br>(0.34)         | 1.0% (26.9)   |  |
| N-N  | Aerobic soil            |            | Not detected            | Not detected  |  |
| CAS# 1253511-94-2  | Anaerobic soil          |            | Not detected            | Not detected  |  |
| CAS or chemical name:<br>Carbamic acid, <i>N</i> -[6-[[[( <i>E</i> )-[(1-methyl- | Aerobic aquatic         |            | Not detected            | Not detected  |  |
| 1 <i>H</i> -tetrazol-5-yl)phenylmethylene]amino]oxy]methyl]-                     | Anaerobic a             | aquatic    | Not detected            | Not detected  |  |

| Chemical structure and chemical name  |                         | Study type    |                            | Final %AR<br>by study end<br>(study length<br>in days)          |
|---|-------------------------|---------------|----------------------------|---|
| 2-pyridinyl]-, 1,1-dimethylethyl ester  Common name: Unknown / unavailable  Synonyms:     | Field studie            | Field studies |                            | 16.8% (366) Combined picarbutrazox & TZ-1E 11.3% (731) Combined |
| E-Isomer of Picarbutrazox   |                         |               |                            | picarbutrazox<br>& TZ-1E  |
|   | Koc                     |               | 3741±1550 (1               | 530 - 5849)   |
| TZ-2  | Hydrolysis              |               | 100.9%                     | 100.9%  |
|   | (pH 4, 7 and            | d 9)          | (7)                        | (7)   |
|   | Soil photoly            | ysis          | 21.0%<br>(5.5)             | 6.7%<br>(29.9)  |
| $H_2N$  | Aqueous<br>Photolysis   | Water         | 5.3% AR<br>(0)             | 0.8% (30)   |
| N N N   |                         | рН 9          | 0.4%                       | < LOQ<br>(26.9)   |
| N-N   | Aerobic soi             | Aerobic soil  |                            | 44.9%<br>(120)  |
| CAS# 500206-79-1  | Anaerobic               | soil          | (62)<br>60.3%<br>(60)      | 58.5%<br>(120)  |
| CAS or chemical name:   | Aerobic aqu             | ıatic         | 26.7% (100)                | 26.7%<br>(100)  |
| Methanone, (1-methyl-1H-tetrazol-5-yl)phenyl-, O-[(6-amino-2-pyridinyl)methyl]oxime, (Z)- | Anaerobic aquatic       |               | 22.0%<br>(63)              | 15.0%<br>(100)  |
| pyridinyr)meuryrjoxime, (2)-  | Field studie            | S             | 14.9% (270)                | 4.5% (731)  |
| Common name:  | Vapour Pre              | ssure         | < 1.0x 10 <sup>-5</sup> Pa | at 50°C   |
| Unknown / unavailable   | Koc                     | -             |                            | 3.77  |
| Synonyms:   |                         |               |                            |   |
| Unknown / unavailable   | TT 1 1 .                |               |                            |   |
| TZ-4  | Hydrolysis (pH 4, 7 and |               | Not detected               | Not detected  |
|   | Soil photoly            |               | Not detected               | Not detected  |
|   | Aqueous                 | Water         | 34.1%                      | 6.5%  |
|   | photolysis              |               | (9)                        | (30)  |

| Chemical structure and chemical name   | Study type  |       | Maximum<br>%AR (day)       | Final %AR<br>by study end<br>(study length<br>in days) |
|--|---|-------|----------------------------|--|
| N. Å   |   | рН 9  | 67.0% (0.25)               | 15.6%<br>(26.9)  |
|  | Aerobic soi   |       | 8.2%<br>(120)              | 8.2%<br>(120)  |
| N-IV   | Anaerobic s   | soil  | 6.0% (0)                   | 1.2% (120)   |
| CAS# 22452 25 4  | Aerobic aqu   |       | 9.6% (14)                  | 5.6% (100)   |
| CAS# 33452-25-4<br>CAS or chemical name:                                       | Anaerobic a   |       | 8.5% (32)                  | 3.8% (101)   |
| Methanone, (1-methyl-1H-tetrazol-5-  | Field studie  | S     | <10.0%<br>No data          | <10.0%   |
| yl)phenyl  Common name: Unknown/not available  Synonyms: Unknown/not available |   |       |                            |  |
| TY-3   | Hydrolysis<br>(pH 4, 7 and 9)<br>Soil<br>Photolysis |       | Not detected               | Not detected   |
|  |   |       | Not detected               | Not detected   |
| NOW HAND   | Aqueous<br>Photolysis                               | Water | 19.5%<br>(9)               | (30)   |
| CAS# 956523-98-1   |   | pH 9  | 26.6%                      | 0.2%   |
| CAS or chemical name:  | Aerobic soi   | 1     |                            | Not detected   |
| Carbamic acid, N-(6-formyl-2-pyridinyl)-<br>, 1,1-dimethylethyl ester          | Anaerobic so  |       | Not detected Not detected  | Not detected  Not detected                             |
| , 1,1-difficulty lesier  | Aerobic aqu   |       | Not detected  Not detected | Not detected  Not detected                             |
| Common name:   | Anaerobic a   |       | Not detected               | Not detected   |
| Unknown/not available  | Field studie  |       | Not detected               | Not detected   |
| Synonyms: Unknown/not available  | K <sub>OC</sub>                                     |       | No data                    |  |
| TY-5   | Hydrolysis<br>(pH 4, 7 and                          | d 9)  | Not detected               | Not detected   |
|  | Soil<br>Photolysis                                  |       | Not detected               | Not detected   |

| Chemical structure and chemical name                                | Study type              |         | Maximum<br>%AR (day) | Final %AR<br>by study end<br>(study length<br>in days) |
|---|-------------------------|---------|----------------------|--|
| HO  | Aqueous<br>Photolysis   | Water   | 17.0% (9)            | 5.7% (30)  |
|   |                         | pH 9    | 20.0% (9)            | (30)   |
|   | Aerobic soi             | 1       | Not detected         | Not detected   |
| CAS# 1011716-08-7   | Anaerobic s             | soil    | Not detected         | Not detected   |
|   | Aerobic aqu             | ıatic   | Not detected         | Not detected   |
| CAS or chemical name:   | Anaerobic a             | aquatic | Not detected         | Not detected   |
| 1H-Pyrrole-1-carboxylic acid, 2,5-dihydro-2-hydroxy-5-oxo-, 1,1-    | Field studie            | S       | Not detected         | Not detected   |
| dimethylethyl ester   | Koc                     |         | No data              |  |
| Common name: Unknown/not available  Synonyms: Unknown/not available |                         |         |                      |  |
| TY-6  | Hydrolysis (pH 4, 7 and | d 9)    | Not detected         | Not detected   |
| HN NH   | Soil<br>Photolysis      |         | Not detected         | Not detected   |
|   | Aqueous                 | Water   | 55%                  | 55%  |
| но  | Photolysis              |         | (30)                 | (30)   |
| CAS# 34085-09-1   |                         | pH 9    | 47.1%                | 47.1%  |
|   |                         |         | (30)                 | (30)   |
| CAS or chemical name:<br>2H-Pyrrol-2-one, 1,5-dihydro-5-hydroxy     | Aerobic soi             | 1       | Not detected         | Not detected   |
| 211-1 y1101-2-011c, 1,3-u111yu10-3-11yu10xy                         | Anaerobic s             |         | Not detected         | Not detected   |
| Common name:  | Aerobic aqu             |         | Not detected         | Not detected   |
| Isosuccinimide  | Anaerobic a             |         | Not detected         | Not detected   |
|   | Field studie            | _       | Not detected         | Not detected   |
| Synonyms:<br>Unknown/not available                                  | Koc                     |         | No data              | •  |

| Chemical structure and chemical name   | Study type                | Study type        |              | Final %AR<br>by study end<br>(study length<br>in days) |
|--|---------------------------|-------------------|--------------|--|
| TY-9   | Hydrolysis<br>(pH 4, 7 an | (pH 4, 7 and 9)   |              | Not detected   |
| H <sub>2</sub> N   | Soil<br>Phototransf       |                   | Not detected | Not detected   |
| Ĭ , OH   | Aqueous                   | Water             | Not detected | Not detected   |
| TY-9   | Phototrans -formation     | pH 9              | (30)         | (30)   |
| CAS# 638-32-4  | Aerobic soi               | 1                 | Not detected | Not detected   |
|  | Anaerobic                 | soil              | Not detected | Not detected   |
| CAS or chemical name:  | Aerobic aq                | uatic             | Not detected | Not detected   |
| Butanoic acid, 4-amino-4-oxo   | Anaerobic                 | Anaerobic aquatic |              | Not detected   |
| Common name:   | Field studie              | es                | Not detected | Not detected   |
| Succinamic acid  Synonyms: Butanedioic acid monoamide, 4-Amino-4-oxobutanoic acid, 4-Oxo-4-aminobutyric acid, Succinic monoamide | Koc                       |                   | No data      |  |
| TZ-4-1   | Hydrolysis<br>(pH 4, 7 an | d 9)              | Not detected | Not detected   |
| N. A. OH   | Soil<br>Photolysis        |                   | Not detected | Not detected   |
| N T T  | Aqueous                   | Water             | 26.4%        | 26.4%  |
| N-N  | photolysis                |                   | (30)         | (30)   |
|  |                           | pH 9              | Not detected | Not detected   |
|  | Aerobic soi               | Aerobic soil      |              | Not detected   |
| CAS# Not registered  | Anaerobic                 | soil              | Not detected | Not detected   |
|  | Aerobic aq                | uatic             | Not detected | Not detected   |
| CAS or chemical name:  | Anaerobic                 | Anaerobic aquatic |              | Not detected   |
|  | Field studie              | Field studies     |              | Not detected   |

| Chemical structure and chemical name    | Study type                 | Study type       |                   | Final %AR<br>by study end<br>(study length<br>in days) |
|---|----------------------------|------------------|-------------------|--|
| Unknown/not available                   | Koc                        |                  | No data           |  |
| Common name:<br>Unknown/not available   |                            |                  |                   |  |
| Synonyms:<br>Unknown/not available      |                            |                  |                   |  |
| TT-3                                    | Hydrolysis (pH 4, 7 and    | d 9)             | Not detected      | Not detected   |
| o<br>o                                  | Soil<br>Photolysis         |                  | Not detected      | Not detected   |
| NN OH                                   | Aqueous                    | Water            | 36.6%             | 36.6%  |
|   | photolysis                 |                  | (30)              | (30)   |
|   |                            | pH 9             | 33.7%             | 33.7%  |
| CAS# 77689-87-3                         |                            |                  | (30)              | (30)   |
| CAS or chemical name:                   | Aerobic soil               |                  | 40.1%<br>(120)    | 40.1%<br>(120)   |
| 1-Methyl-1H-tetrazole-5-carboxylic acid | Anaerobic s                |                  | Not detected      | Not detected   |
| Common name:                            | Aerobic aqu                |                  | Not detected      | Not detected   |
| Unknown/not available                   | Anaerobic a                | -                | Not detected      | Not detected   |
| Childwin not available                  | Field studie               | S                | Not detected      | Not detected   |
| Synonyms:<br>Unknown/not available      | Koc                        |                  | No data           |  |
| TT-1                                    | Hydrolysis (pH 4, 7 and 9) |                  | Not detected      | Not detected   |
| N <sub>N</sub> >                        | Soil<br>Photolysis         | ,                | Not detected      | Not detected   |
| N~N.                                    | Aqueous photolysis         | Distille d water | <b>15.0%</b> (30) | <b>15.0%</b> (30)                                      |
|   |                            | Natural          | 17.7%             | 17.7%  |
| CAS# 16681-77-9                         |                            | Water            | (30)              | (30)   |
| CAS or chemical name:                   |                            | pH 9<br>Buffer   | 28.2% (30)        | 28.2% (30)   |
| 1-Methyltetrazole                       | Aerobic soi                |                  | No data           | No data  |

| Chemical structure and chemical name                    |                            | Study type          |                      | Final %AR<br>by study end<br>(study length<br>in days) |
|---|----------------------------|---------------------|----------------------|--|
| Common name:  | Anaerobic s                |                     | No data              | No data  |
| Unknown/not available                                   | Aerobic aqu                | uatic               | No data              | No data  |
|   | Anaerobic a                | Anaerobic aquatic N |                      | No data  |
| Synonyms:<br>1-Methyl-1h-Tetrazole                      | Field studie               | es .                | No data              | No data  |
| 1-Methyl-111-Tetrazole                                  | Koc                        |                     | No data              |  |
| TZ-3E   | Hydrolysis (pH 4, 7 and    | d 9)                | Not detected         | Not detected   |
| N II  | Soil<br>Photolysis         |                     | Not detected         | Not detected   |
| N'N'N   | Aqueous photolysis         | Distille d water    | 14.1% (21)           | 7.9 - 8.9% (30)  |
|   |                            | Natural<br>Water    | 3.0% (9)             | < LOQ (30)   |
| CAS# 1456696-38-0                                       |                            | pH 9<br>Buffer      | Not detected         | Not detected   |
|   | Aerobic soi                | 1                   | No data              | No data  |
| CAS or chemical name:                                   | Anaerobic soil             |                     | No data              | No data  |
| Methanone, (1-methyl-1H-tetrazol-5-                     | Aerobic aquatic            |                     | No data              | No data  |
| yl)phenyl-, oxime, (1E)-                                | Anaerobic a                | Anaerobic aquatic   |                      | No data  |
| Common name:  | Field studie               | es                  | No data              | No data  |
| Unknown/not available                                   | <i>K</i> oc                |                     | No data              |  |
| Synonyms:<br>Unknown/not available                      |                            |                     |                      |  |
| TY-4  | Hydrolysis<br>(pH 4, 7 and | d 9)                | Not detected         | Not detected   |
|   | Soil<br>Photolysis         |                     | Not detected         | Not detected   |
| H.N. K.N.K.   | Aqueous                    | Distille            | <b>12.3%</b> (21)    | 3.6%   |
|   | photolysis                 | d water             |                      | (30)   |
| CAS# 332884-35-2  |                            | Natural<br>Water    | 3.8 % (21)           | 2.2% (30)  |
| CAS or chemical name:<br>6-amino-2-pyridyl carbaldehyde |                            | pH 9<br>Buffer      | Not detected No data | Not detected   |
| o-ammo-2-pyridyr cardaidenyde                           |                            | Aerobic soil        |                      | No data  |
|   | Anaerobic s                | soil                | No data              | No data  |

| Chemical structure and chemical name                                |                         | Study type    |                | Final %AR by study end (study length in days) |
|---|-------------------------|---------------|----------------|---|
| Common name:  | Aerobic aqu             |               | No data        | No data                                       |
| Unknown/not available   | Anaerobic a             |               | No data        | No data                                       |
|   | Field studie            | Field studies |                | No data                                       |
| Synonyms: 2-Amino-6-Pyridine Carboxaldehyde, 6-Aminopicolinaldehyde | Koc                     |               | No data        |   |
| TY-8  | Hydrolysis (pH 4, 7 and | d 9)          | Not detected   | Not detected                                  |
| 0   | Soil<br>Photolysis      |               | Not detected   | Not detected                                  |
| //  | Aqueous                 | Water         | 23%            | 23%   |
| HN )  | photolysis              |               | (30)           | (30)  |
| \   |                         | pH 9          | Not detected   | Not detected                                  |
| //  | Aerobic soi             | 1             | No data        | No data                                       |
| O   | Anaerobic s             | soil          | No data        | No data                                       |
|   | Aerobic aquatic         |               | No data        | No data                                       |
| CAS# 123-56-8   | Anaerobic a             | aquatic       | No data        | No data                                       |
| CAS or chemical name:   | Field studie            | S             | No data        | No data                                       |
| 2,5-Pyrrolidinedione  Common name: Succinimide                      | Koc                     | Koc           |                |   |
| Synonyms:<br>Many   |                         |               |                |   |
| TZ-5  | Hydrolysis (pH 4, 7 and | d 9)          | Not detected   | Not detected                                  |
| N-  | Soil photolysis         |               | Not detected   | Not detected                                  |
|   | Aqueous                 | Water         | Not detected   | Not detected                                  |
| N L   | photolysis              | pH 9          | Not detected   | Not detected                                  |
| N   | Aerobic soi             | 1             | 9.9%           | 9.9%  |
| CAS# 33452-21-0   | 7 ICIOUIC SUI           | .1            | (120)          | (120)   |
| 011011 33732 21 0   | Anaerobic soil          |               | 17.6%<br>(120) | 17.6%   |
| CAS or chemical name:   | 7 macroore s            | Anaerouic Son |                | (120)   |
| 1H-Tetrazole-5-methanol, 1-methyl-α-                                | Aerobic aqu             | natic         | 47.6%          | 47.6%   |
| phenyl-   | 71010010 441            |               | (100)          | (100)   |
| F - 3-  | Anaerobic a             | aquatic       | 77.4%          | 73.1  |
|   |                         | 1             | (60)           | (101)   |

| Chemical structure and chemical name                | Study type             | Study type     |                        | Final %AR<br>by study end<br>(study length<br>in days) |  |
|---|------------------------|----------------|------------------------|--|--|
| Common name:  | Field studie           | Field studies  |                        |  |  |
| Unknown/not available                               | Koc                    |                | No data                |  |  |
| Synonyms:<br>Unknown/not available                  |                        |                |                        |  |  |
| TY-2  | Hydrolysis (pH 4, 7 an | d 9)           | Not detected           | Not detected   |  |
|   | Soil photolysis        |                | Not detected           | Not detected   |  |
|   | Aqueous                | Water          | Not detected           | Not detected   |  |
| H <sub>2</sub> N N                                  | photolysis             | pH 9           | Not detected           | Not detected   |  |
| OH  | Aerobic so             | il             | Not detected           | Not detected   |  |
|   | Anaerobic              | Anaerobic soil |                        | 8.6%<br>(120)  |  |
| CAS# 79651-64-2                                     | Aerobic aq             | uatic          | (120)<br>6.1%<br>(100) | 6.1% (100)   |  |
| CAS or chemical name:<br>2-Aminopyridine-6-methanol | Anaerobic              | aquatic        | 23.4% (100)            | 23.4%<br>(100)   |  |
|   | Field studie           | es             | Not detected           | Not detected   |  |
| Common name:<br>Unknown/not available               | Koc                    |                | No data                |  |  |
| Synonyms: (6-Aminopyridin-2-yl)methanol             |                        |                |                        |  |  |
| MINOR (<10%) TI                                     | RANSFORM               | ATION          | PRODUCTS               |  |  |
| TZ-2E   | Hydrolysis (pH 4, 7 an | d 9)           | Not detected           | Not detected   |  |
|   | Soil photolysis        |                | 9.7% (19.7)            | 6.7% (27.8)  |  |
|   | Aqueous photolysis     | Water pH 9     | Not detected           | Not detected   |  |
|   | Aerobic so             | i1             | Not detected           | Not detected   |  |
|   | Anaerobic              |                | Not detected           | Not detected   |  |
|   | Aerobic aq             |                | Not detected           | Not detected   |  |
|   | Anaerobic              |                | Not detected           | Not detected   |  |
|   | Field studie           | es             | <14.9%                 | Not detected   |  |

| Chemical structure and chemical name  | Study type                 |       | Maximum<br>%AR (day) | Final %AR<br>by study end<br>(study length<br>in days) |
|---|----------------------------|-------|----------------------|--|
| CAS# Not registered  CAS or chemical name: Unknown/not available  Common name: Unknown/not available  Synonyms: Unknown/not available | Koc                        |       | No data              |  |
| TY-1  | Hydrolysis<br>(pH 4, 7 and |       | Not detected         | Not detected   |
| J. J. J. OH   | Soil photolysis            | Water | Not detected 5.1%    | Not detected 2.4%                                      |
| CAS# 203321-83-9  | Aqueous photolysis         | water | (9)                  | (30)   |
| CAS or chemical name: Carbamic acid, N-[6-(hydroxymethyl)-2-  |                            | рН 9  | 2.2% (9)             | 0.9% (30)  |
| pyridinyl]-, 1,1-dimethylethyl ester  | Aerobic soil               |       | Not detected         | Not detected   |
| Common name:<br>Unknown/not available   | Anaerobic s                | soil  | 0.5% (14)            | < LOQ (100)  |
| Chritowii/hot availauic   | Aerobic aquation           |       | 1.9% (63)            | < LOQ (100)  |
| Synonyms:   | Anaerobic a                |       | 7.3% (63)            | 3.1% (101)   |
| tert-butyl [6-(hydroxymethyl)-2-  | Field studie               | S     |                      |  |
| pyridyl]carbamate   | Other                      |       |                      |  |
|   | Koc                        |       | No data              |  |

| Chemical structure and chemical name                        | Study type              | Study type |              | Final %AR<br>by study end<br>(study length<br>in days) |
|---|-------------------------|------------|--------------|--|
| TY-10   | Hydrolysis              |            | Not detected | Not detected   |
|   | (pH 4, 7 and            | d 9)       |              |  |
| 0   | Soil                    |            | Not detected | Not detected   |
| II  | photolysis              |            |              |  |
| HO \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \                    | Aqueous                 | Water      | Not detected | Not detected   |
| J , OH  | photolysis              | pH 9       | 9.4%         | 9.4%   |
| 0   |                         |            | (30)         | (30)   |
| CAS# 110-15-6   | Aerobic soi             | 1          | Not detected | Not detected   |
| CA5# 110-13-0   | Anaerobic s             | soil       | Not detected | Not detected   |
| CAS or chemical name:                                       | Aerobic aqu             | uatic      | Not detected | Not detected   |
| Butanedioic acid  | Anaerobic a             | aquatic    | Not detected | Not detected   |
| Butumediole deld  | Field studie            | S          | Not detected | Not detected   |
| Common name:  | Other                   |            |              |  |
| Succinic acid   | <b>K</b> oc             |            | No data      |  |
| Synonyms: Many synonyms TZ-3                                | Hydrolysis              |            | Not detected | Not detected   |
|   | (pH 4, 7 and            | d 9)       |              |  |
| HON   | Soil photolysis         |            | Not detected | Not detected   |
| N I A   | Aqueous                 | Water      | 2.0%         | < LOQ (30)   |
| N N N   | photolysis              |            | (21)         |  |
| N . ·   |                         | pH 9       | Not detected | Not detected   |
|   | Aerobic soi             | 1          | Not detected | Not detected   |
| CAS# 1083086-53-6   | Anaerobic               | soil       | Not detected | Not detected   |
|   | Aerobic aqu             | uatic      | Not detected | Not detected   |
| CAS or chemical name:                                       | Anaerobic a             | aquatic    | Not detected | Not detected   |
| Methanone, (1-methyl-1H-tetrazol-5-yl)phenyl-, oxime, (1Z)- | Field studie            | es .       | Not detected | Not detected   |
| Common name:<br>Unknown/not available                       | Koc                     |            | No data      |  |
| Synonyms:<br>Unknown/not available                          |                         |            |              |  |
| TZ-7  | Hydrolysis (pH 4, 7 and | d 9)       | Not detected | Not detected   |

| Chemical structure and chemical name | Study type      |        | Maximum<br>%AR (day) | Final %AR by study end (study length in days) |
|--------------------------------------|-----------------|--------|----------------------|---|
| , N N                                | Soil photolysis |        | Not detected         | Not detected                                  |
| OH N                                 | Aqueous         | Water  | Not detected         | Not detected                                  |
| N. N.                                | photolysis      | pH 9   | Not detected         | Not detected                                  |
| N-N                                  | Aerobic soil    |        | 6.7%                 | 6.5% (120)                                    |
| CAS# Not registered                  |                 |        | (62)                 |   |
|                                      | Anaerobic s     | soil   | 6.7%                 | 6.1   |
| CAS or chemical name:                |                 |        | (30)                 | (120)   |
| Unknown/not available                | Aerobic aqu     | ıatic  | Not detected         | Not detected                                  |
|                                      | Anaerobic a     | quatic | Not detected         | Not detected                                  |
| Common name:                         | Field studie    | S      | Not detected         | Not detected                                  |
| Unknown/not available                | Koc             |        | No data              |   |
| Synonyms:                            |                 |        |                      |   |
| Unknown/not available                |                 |        |                      |   |

Table 11 Summary of fate and behaviour of picarbutrazox in the environment

| Study type                     | Test<br>substance      | DT50/t1/2,rep (days)                                    | Transformation products  | Comments/<br>classification  | PMRA#   |  |  |  |
|--------------------------------|------------------------|---|--|--|---------|--|--|--|
| Abiotic transformati           | Abiotic transformation |   |  |  |         |  |  |  |
| Hydrolysis                     | Picarbutrazox          | \ 1 /   | Major:<br>TZ-2 up to 99.8% AR <sup>1</sup><br>Minor: None  | Non-persistent at pH < 4. Slightly persistent at $7 \le pH \le 9$  | 2809366 |  |  |  |
| Phototransformation<br>on soil | Picarbutrazox          | 89.0/89.0 (Combined residue of picarbutrazox and TZ-1E) | Major: TZ-1E (e-Isomer of picarbutrazox) up to 33.6% AR TZ-2 up to 15.8% AR Minor: TZ-2E up to 7.9% AR CO <sub>2</sub> up to 0.9% AR | Moderately<br>persistent<br>t <sub>1/2,rep</sub> includes<br>combined<br>residues of<br>picarbutrazox and<br>TZ-1E | 2809368 |  |  |  |

| Phototransformation | Combined      | 3.0/3.0                | Major:                        | Non-persistent                | 2809370,      |
|---------------------|---------------|------------------------|-------------------------------|-------------------------------|---------------|
| in water            | residues of   | (distilled water, pH = | TZ-1E up to 76.3 %            | Tron persistent               | 2809374 &     |
| iii watei           | Picarbutrazox | 6.63-7.75)             | AR                            | t <sub>1/2,rep</sub> includes | 2809374 &     |
|                     | and TZ-1E     | 0.03 7.73)             | TZ-3E up to 14.1%             | combined                      | 2007370       |
|                     | and 12-11     | 3.8/3.8                | AR                            | residues of                   |               |
|                     |               | (natural water, pH =   | TZ-4 up to 34.1% AR           | picarbutrazox and             |               |
|                     |               | 7.08-7.88)             | TZ-4-1 up to 26.4%            | TZ-1E                         |               |
|                     |               | 7.00-7.00)             | AR                            | 1Z-1E                         |               |
|                     |               |                        | TY-3 up to 19.5% AR           |                               |               |
|                     |               |                        | TY-4 up to 12.3% AR           |                               |               |
|                     |               |                        | TY-5 up to 17.0% AR           |                               |               |
|                     |               |                        | TY-6 up to 55.0% AR           |                               |               |
|                     |               |                        | TY-8 up to 23.0% AR           |                               |               |
|                     |               |                        | TT-1 up to 17.7% AR           |                               |               |
|                     |               |                        | TT-3 up to 36.6% AR           |                               |               |
|                     |               |                        | 11-5 up to 50.070 AR          |                               |               |
|                     |               |                        | Minor:                        |                               |               |
|                     |               |                        | TZ-2 up to 5.3% AR            |                               |               |
|                     |               |                        | TZ-3 up to 3.0% AR            |                               |               |
|                     |               |                        | TY-1 up to 5.1% AR            |                               |               |
|                     |               |                        | CO <sub>2</sub> up to 3.3% AR |                               |               |
| Phototransformation | Combined      | 1.7/1.7 (pH 9 buffer)  | Major:                        | Non-persistent                | 2809372,      |
| in pH 9 buffer      | residues of   | 1.771.7 (pir 5 buller) | TZ-1E up to 76.8%             | Tron persistent               | 2809376,      |
| (summer light)      | Picarbutrazox |                        | AR                            | t <sub>1/2,rep</sub> includes | 2809380       |
| (Summer light)      | and TZ-1E     |                        | TZ-4 up to 65.2% AR           | combined                      | 2007300       |
|                     | una 12 12     |                        | TY-3 up to 22.1% AR           | residues of                   |               |
|                     |               |                        | TY-5 up to 18.9% AR           | picarbutrazox and             |               |
|                     |               |                        | TY-6 up to 46.7% AR           | TZ-1E                         |               |
|                     |               |                        | TY-9 up to 20.0% AR           | IZ IZ                         |               |
|                     |               |                        | TT-3 up to 34.4% AR           |                               |               |
|                     |               |                        | TT-1 up to 26.6% AR           |                               |               |
|                     |               |                        | 11 1 up to 20.070 THE         |                               |               |
|                     |               |                        | Minor:                        |                               |               |
|                     |               |                        | TZ-2 up to 1.3% AR            |                               |               |
|                     |               |                        | TY-1 up to 2.0% AR            |                               |               |
|                     |               |                        | TY-10 up to 8.7% AR           |                               |               |
|                     |               |                        | CO2 up to 1.5% AR             |                               |               |
| Phototransformation | NA            | NA                     | NA                            | Not expected to               | NA            |
| in air              | = 12 2        | = -= -                 | = := =                        | be a route of                 | 1 12 <b>1</b> |
|                     |               |                        |                               | dissipation                   |               |
| Volatilization      | NA            | NA                     | NA                            | Not expected                  | NA            |
| · Clatillation      | - 1.2.2       | - 1                    | - 12                          | based on vapour               | 1 12 1        |
|                     |               |                        |                               | pressure and                  |               |
|                     |               |                        |                               | Henry's law                   |               |
|                     |               |                        |                               | constant                      |               |
|                     | 1             |                        |                               | - CIISMIII                    |               |

| Biotransformation in                |                |   |  |                               |                     |
|-------------------------------------|----------------|---|--|-------------------------------|---------------------|
| Biotransformation in aerobic soil   | Picarbutrazox  | 48.6/64.0<br>(DT <sub>50</sub> : 90% upper bound on the mean: 48.6; n=5)<br>DT <sub>50</sub> range: 31.3-53<br>(t <sub>1/2,rep</sub> : 90% upper bound on the mean: 64.0; n=5)<br>t <sub>1/2,rep</sub> range: 34.6-72.7 | Major:<br>TZ-2 up to 45.5% AR<br>TT-3 up to 34.5% AR<br>Minor:<br>TZ-4, TZ-5, TZ-7 up to<br>< 6.4% AR  | Moderately<br>persistent      | 2809382,<br>2917291 |
| Biotransformation in aerobic soil   | TZ-2           | 131/273.9  (DT <sub>50</sub> : 90% upper bound on the mean: 102.6; n=4) DT50 range: 29.9-146  (t <sub>1/2,rep</sub> 90% upper bound on the mean: 244.5; n=4) t <sub>1/2,rep</sub> range: 191-307                        | Major: None<br>Minor: Unidentified up<br>to < 8.6% AR  | Moderately<br>Persistent      | 2809384             |
| Biotransformation in anaerobic soil | Picarbutrazox  | 144.6/144.6  (DT <sub>50</sub> : 90% upper bound on the mean: 101.5; n=4) t <sub>1/2,rep</sub> range: 52.7-150  (t <sub>1/2,rep</sub> 90% upper bound on the mean: 101.5; n=4) t <sub>1/2,rep</sub> range: 52.7-150     | Major:<br>TZ-2 up to 59.4% AR<br>TZ-5 up to 15.0% AR<br>Minor:<br>TZ-4 up to 5.6% AR<br>TZ-7 up to 6.3% AR<br>TY-1 up to 0.3% AR<br>TY-2 up to 7.1% AR | Moderately persistent         | 2809387             |
| Mobility                            |                |   |  |                               |                     |
| Property                            | Test substance | Mean K <sub>d</sub> /K <sub>OC</sub> (L/g)  | Comment  | Mobility classification       | PMRA#               |
| Adsorption in soil                  | Picarbutrazox  | 52.58±38.83 (23.39-<br>122.15) / 3741±1550<br>(1530 - 5849)   | Linear adsorption, 6 soils   | Immobile to low mobility      | 2809397             |
|                                     | TZ-2           | 32.96±35.56 (6.37-<br>90.15)/<br>1713.19±2058.77<br>(426.7 - 5359)  | Linear adsorption, 5 soils   | Immobile to moderate mobility | 2809399             |

| Soil leaching                                  |              | Picarbi           | ıtrazox                                |                           |                               | ing to criteria of Cohen e  | t al. Non-leacher  | NA                               |
|--|--------------|-------------------|--|---------------------------|-------------------------------|---|--|----------------------------------|
|  |              | TZ-2              |  | Non-le                    |                               | r depending on soil organ<br>of Cohen et al. and GUS                                |  | NA                               |
| Field dissipation                              | n            | •                 |  |                           |                               |   | ,  |                                  |
| Test   |              |                   | Test<br>and                            | item<br>rate              | ′ 1                           | Major<br>transformation<br>products   | Classification/co<br>mments                                      | PMRA#                            |
| Field dissipation                              |              | fornia -<br>grass | Picarbu<br>applied<br>formul<br>produc | l as<br>ated              | 78.9/78.9                     | TZ-1E (e-isomer of picarbutrazox) up to 29.8% AR                                    | Moderately persistent, max. depth <15 cm, 1.5% carry-over        | 2809401,<br>2835445,<br>2835446, |
|  | _            | ifornia<br>ground | (9.61% picarbu                         | w/w                       | 92.9/92.9                     | TZ-1E was included in t <sub>1/2,rep</sub> calculations and carry-over percentages) | Moderately persistent, max. depth <30 cm, 1.2% carry-over,       | 2835447                          |
|  |              | orgia –<br>grass  | Four<br>applica<br>of 364<br>a.i./ha   | g                         | 122/122                       | TZ-2 up to 13.3% AR TZ-2E up to 14.9%   | Moderately persistent, max. depth <15 cm, 1.8% carry-over        |                                  |
|  |              | orgia -<br>ground | 14 day<br>applica<br>interva<br>1456 g | ition<br>l (Toal          | 31.1/112                      | AR  | Slightly<br>persistent, max.<br>depth <45 cm,<br>2.6% carry-over |                                  |
|  | Iowa<br>Turf | grass             | a.i./ha)                               |                           | 238/238                       |   | Persistent, max.<br>depth <30 cm,<br>4.2% carry-over             |                                  |
|  | Iowa<br>Bare | ı –<br>ground     |  |                           | 105/105                       |   | Moderately persistent, max. depth <30 cm, 3.8% carry-over        |                                  |
|  | Idah<br>Turf | o –<br>grass      |  |                           | 360/360                       |   | Persistent, max.<br>depth <30 cm,<br>13.8% carry-over            |                                  |
|  | Idah<br>Bare | o -<br>ground     |  |                           | 98.6/239                      |   | Moderately persistent, max. depth <30 cm, 8.7% carry-over        |                                  |
|  |              | York –<br>grass   |  |                           | 257/257                       |   | Persistent, max.<br>depth <15 cm,<br>16.8% carry-over            |                                  |
|  | Bare         | York –<br>ground  |  |                           | 55.6/357                      |   | Moderately persistent, max. depth <15 cm, 14.2% carry-over       |                                  |
| Biotransforma                                  | tion i       | n aquati          | c envir                                | onment                    | t                             |   |  |                                  |
| Property                                       |              | Test sub          | stance                                 | DT50                      | )/t <sub>1/2,rep</sub> (days) | Major<br>transformation<br>products   | Comments/<br>classification                                      | PMRA#                            |
| Biotransformati<br>in aerobic water<br>systems |              | Picarbu           | trazox                                 | Water:<br>10.5-1<br>(n=2) | 0.9/10.5-10.9                 | TZ-2 up to 21.6%AR<br>TZ-5 up to 46.9%AR  | Slightly to<br>moderately<br>persistent in<br>whole system       | 2809389                          |
|  |              |                   |  | Total s                   | system:                       |   |  |                                  |

|  |                  | 33.5-53.2/50.7-85.7<br>(n=2)  |   |  |         |
|--|------------------|---|---|--|---------|
| Biotransformation<br>in aerobic water<br>systems   | TZ-2             | Water:<br>3.19-3.58/6.12-13.5<br>(n=2)<br>Total system:<br>42.3-53.0/77.3-<br>97.4(n=2) | CO <sub>2</sub> up to 17.3%AR                                     | Slightly to<br>moderately<br>persistent in<br>whole system | 2809391 |
| Biotransformation<br>in aerobic water<br>systems   | TZ-5             | Water:<br>29-76.2/66.6-<br>842(n=2)<br>Total system:<br>199-511/199-32400<br>(n=2)      | None  | Persistent in whole system                                 | 2809393 |
| Biotransformation<br>in anaerobic water<br>systems | Picarbutrazox    | Water:<br>9.33-25.3/9.33-25.3<br>(n=2)<br>Total system:<br>20.9-31.7/20.9-31.7<br>(n=2) | TZ-2 up to 21.6% AR<br>TZ-5 up to 74.9% AR<br>TY-2 up to 22.3% AR | Slightly<br>persistent in<br>whole system                  | 2809395 |
| Partitioning                                       | •                |   | •   | •  |         |
| Picarbutrazox                                      | Primarily in the | sediment layer.   |   |  | NA      |
| Bioconcentration                                   |                  |   |   |  |         |
| Not expected to bioa                               |                  | = 314.  |   |  | 2809514 |

Table 12 Summary of toxicity effects of picarbutrazox, TZ-1E, TZ-2 and TZ-5 on terrestrial organisms

| Organism                      | Test<br>substance  | Exposure              | Endpoint value   | Effects/ Degree of toxicity <sup>1</sup> | PMRA#   |
|-------------------------------|--|-----------------------|--|--|---------|
| Invertebrates                 | •  |                       |  |  |         |
| Eisenia fetida<br>(Earthworm) | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 28 days,<br>mortality | LC <sub>50</sub> >1000 mg a.i./kg<br>dry soil<br>NOEC = 1000 mg a.i./kg<br>dry soil<br>No statistically<br>significant effects on<br>mortality were observed<br>up to the highest<br>concentration tested. | NA                                       | 2809408 |
|                               |  | 56 days, reproduction | NOEC = 96 mg a.i./kg<br>dry soil   | NA                                       |         |

<sup>&</sup>lt;sup>1</sup>Percent of applied radioactivity.
<sup>2</sup>Region not considered by the PMRA as they do not represent Canadian field use conditions.

| Organism                   | Test<br>substance  | Exposure                        | Endpoint value   | Effects/ Degree of toxicity <sup>1</sup> | PMRA#   |
|----------------------------|--|---------------------------------|--|--|---------|
|                            | TZ-1E  | 28 days,<br>mortality           | LC <sub>50</sub> >1100 mg/kg dry<br>soil<br>NOEC = 1100 mg/kg dry<br>soil<br>No statistically<br>significant effects on<br>mortality were observed<br>up to the highest<br>concentration tested. | NA                                       | 2809410 |
|                            |  | 56 day, reproduction            | NOEC = 1100 mg/kg dry soil   | NA                                       |         |
|                            | TZ-2   | 28 day,<br>mortality            | LC <sub>50</sub> >1000 mg/kg dry<br>soil<br>NOEC = 1000 mg/kg dry<br>soil<br>No statistically<br>significant effects on<br>mortality were observed<br>up to the highest<br>concentration tested. | NA                                       | 2809412 |
|                            |  | 56 day, reproduction            | 56-d NOEC = 560 mg/kg<br>  dry soil  | NA                                       |         |
|                            | TZ-5   | 28 day,<br>mortality            | LC <sub>50</sub> >1000 mg/kg dry<br>soil<br>NOEC = 1000 mg/kg dry<br>soil<br>No statistically<br>significant effects on<br>mortality were observed<br>up to the highest<br>concentration tested. | NA                                       | 2809414 |
|                            |  | 56 day, reproduction            | NOEC = 64 mg/kg dry<br>soil  | NA                                       |         |
| Apis mellifera (Honey bee) | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 48-hour acute oral adult        | LD <sub>50</sub> > 96.8 μg a.i./bee<br>6.7 % mortality was<br>observed at the highest<br>test concentration  | Practically nontoxic                     | 2809420 |
|                            |  | 48-hour acute contact adult     | LD <sub>50</sub> > 96.8 μg a.i./bee<br>1.7% mortality was<br>observed at the highest<br>test concentration   | Practically nontoxic                     | 2809418 |
|                            |  | 10-day<br>chronic diet<br>adult | LD <sub>50</sub> >37 µg a.i./bee/day<br>NOAEL = 37 µg<br>a.i./bee/day<br>0% mortality was<br>observed at the highest<br>test concentration   | NA                                       | 2809416 |

| Organism  | Test<br>substance  | Exposure                                   | Endpoint value  | Effects/ Degree of toxicity <sup>1</sup> | PMRA#   |
|---|--|--|---|--|---------|
|   |  | 72-hour acute larvae                       | LD <sub>50</sub> : >100 µg a.i./larva<br>14% mortality was<br>observed at the highest<br>test concentration   | Practically nontoxic                     | 2809422 |
|   |  | 22-day<br>chronic larvae                   | 15-day LD <sub>50</sub> : > 12.2 μg<br>a.i./larva/day<br>22-day NOAEL <sub>emergence</sub> =<br>5.6 μg a.i./larva/day<br>28% mortality was<br>observed at the highest<br>test concentration   | NA                                       | 2809424 |
| Typhlodromus pyri (Predatory mite)                          | Picarbutrazox<br>formulated<br>product<br>(9.61% w/w<br>picarbutrazox) | 14-d contact<br>glass plate<br>Protonymphs | 14-d LR <sub>50</sub> : >1500 g<br>a.i./ha<br>14-d ER <sub>50 reproduction</sub> :<br>>1500 g a.i./ha<br>8.8% mortality was<br>observed at the highest<br>test concentraiton and<br>reproductive output was<br>reduced by 45.5%<br>observed at the highest<br>test rate | NA                                       | 2809426 |
| Aphidius<br>rhopalosiphi<br>(parasitoid<br>wasp)            | Picarbutrazox<br>formulated<br>product<br>(9.61% w/w<br>picarbutrazox) | 48-h contact glass plate                   | 14-d LR50: >1500 g<br>a.i./ha<br>14-d ER50: >1500 g<br>a.i./ha<br>10% mortality was<br>observed at the highest<br>test rate and reproductive<br>output was reduced by<br>8.9% at the highest test<br>rate   | NA                                       | 2809436 |
| Hypoaspis<br>geolaelaps<br>aculeifer<br>(Predatory<br>mite) | Picarbutrazox<br>formulated<br>product<br>(36.3% w/w<br>picarbutrazox) | 14-d<br>Reproduction<br>test in soil       | 14-d LC <sub>50</sub> : > 363 mg a.i./kg dry soil 14-d EC <sub>50 reproduction</sub> : >363 mg a.i./kg dry soil 13% adult mortality was observed in the highest test concentration and reproductive output was reduced by 40% at the highest test concentration         | NA                                       | 2809428 |

| Organism                                      | Test<br>substance  | Exposure                             | Endpoint value  | Effects/ Degree of toxicity <sup>1</sup> | PMRA#   |
|---|--|--------------------------------------|---|--|---------|
|   | TZ-1E  | 14-d<br>Reproduction<br>test in soil | 14-d LC <sub>50</sub> : > 1000 mg a.i. /kg dry soil 14-d EC <sub>50 reproduction</sub> : > 1000 mg a.i. /kg dry soil 10% adult mortality was observed in the highest test concentration and reproductive output was reduced by 6% in the highest test concentration | NA                                       | 2809430 |
|   | TZ-2   | 14-d<br>Reproduction<br>test in soil | 14-d LC <sub>50</sub> :> 1000 mg/kg dry soil 14-d EC <sub>50 reproduction</sub> :> 1000 mg/kg dry soil 33% adult mortality was observed in the highest test concentration and reproductive output was reduced by 25% in the highest test concentration              | NA                                       | 2809432 |
|   | TZ-5   | 14-d<br>Reproduction<br>test in soil | 14-d LC <sub>50</sub> : >1000 mg/kg dry soil 14-d EC <sub>50 reproduction</sub> : >1000 mg/kg dry soil 10% mortality was observed at the highest test rate and reproductive output was reduced by 14% at the highest test rate                                      | NA                                       | 2809434 |
| Colinus virginianus (Northern Bobwhite quail) | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | Acute oral                           | LD <sub>50</sub> > 2000 mg a.i./kg<br>bw<br>No effects on mortality<br>were observed up to the<br>highest concentration<br>tested.  | Practically nontoxic                     | 2809516 |
|   |  | 5-day Acute<br>Dietary               | $LC_{50} > 5688$ mg a.i./kg diet $LD_{50} > 1347$ mg a.i./kg bw/d No effects on mortality were observed up to the highest concentration tested.   | Practically nontoxic                     | 2809523 |

| Organism                           | Test<br>substance  | Exposure                              | Endpoint value   | Effects/ Degree of toxicity <sup>1</sup> | PMRA#                               |
|------------------------------------|--|---------------------------------------|--|--|-------------------------------------|
|                                    |  | 27 week<br>Reproduction               | NOAEC reproduction: 515 mg a.i./kg (44.2 mg a.i./kg bw/d)  | NA                                       | 2809533,<br>2809535<br>&<br>2835461 |
| Anas<br>platyrhynchos<br>(Mallard) | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | Acute oral                            | LD <sub>50</sub> > 2000 mg a.i./kg<br>bw<br>No effects on mortality<br>were observed up to the<br>highest concentration<br>tested.   | Practically nontoxic                     | 2809519                             |
|                                    |  | 5-day Acute<br>Dietary                | LC <sub>50</sub> > 5819 mg a.i./kg<br>diet<br>LD <sub>50</sub> > 2834 mg a.i./kg<br>bw/d   | Practically nontoxic                     | 2809525                             |
|                                    |  | 27 week<br>Reproduction               | NOAEC reproduction: 343<br>mg a.i./kg<br>(41.8 mg a.i./kg bw/d)  | NA                                       | 2809536,<br>2835462                 |
| Serinus<br>canaria<br>(Canary)     | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | Acute oral                            | LD <sub>50</sub> > 2000 mg a.i./kg<br>bw<br>No effects on mortality<br>were observed up to the<br>highest concentration<br>tested.   | Practically nontoxic                     | 2809521                             |
| Sprague<br>Dawley rats             | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | Single dose<br>Acute oral<br>(gavage) | LD <sub>50</sub> : > 2000 mg a.i./kg<br>bw<br>No effects on mortality<br>were observed up to the<br>highest concentration<br>tested. | Practically nontoxic                     | 2809142                             |
|                                    |  | 1 generation reproduction             | NOAEL reproductive:<br>45.1 mg a.i./kg bw/day<br>Based on decrease in<br>number of F1 pups.  | NA                                       | 2809235                             |
|                                    |  | 2 generation reproduction             | NOAEL reproductive:<br>62.6 mg a.i./kg bw/day<br>Based on decrease in<br>body weight of F2 pups.                                     | NA                                       | 2809237                             |
|                                    | TZ-1E  | Single dose<br>Acute oral<br>(gavage) | LD <sub>50</sub> : > 2000 mg a.i./kg<br>bw<br>No effects on mortality<br>were observed up to the<br>highest concentration<br>tested. | Practically nontoxic                     | 2809144                             |

<sup>&</sup>lt;sup>1</sup>Degree of toxicity classification based on criteria developed by Atkins et al. for bees and USEPA for others, where applicable.

Table 13 Summary of toxicity effects of picarbutrazox, TZ-1E, TZ-2, TZ-4, TZ-5 and TY-3 (TPs) and its associated end-use products on aquatic organisms

| Test<br>organism                 | Test substance  | Exposure                                  | Endpoint                               | Endpoint Value   | Degree of toxicity <sup>1</sup> | PMRA#   |
|----------------------------------|---|---|--|--|---------------------------------|---------|
| Freshwater In                    | vertebrates   | <u>I</u>                                  |  |  | - commonly                      |         |
| Daphnia<br>magna (Water<br>flea) | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 48-h Acute (flow through)                 | 48-h EC <sub>50</sub>                  | > 0.28 mg a.i./L 10%<br>immobility was<br>observed at the highest<br>test concentration                | Highly<br>toxic                 | 2809438 |
|                                  |   | 21-day<br>Life-Cycle<br>(flow<br>through) | 21-d<br>NOAEC <sub>dry</sub><br>weight | 0.13 mg a.i./L   | NA                              | 2809459 |
|                                  | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)  | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | > 1.89 mg a.i./L<br>No effects on mobility<br>were observed up to the<br>highest test<br>concentration | Moderately toxic                | 2809452 |
|                                  | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox) | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | > 3.46 mg a.i./L<br>No effects on mobility<br>were observed up to the<br>highest test<br>concentration | Moderately toxic                | 2809454 |
|                                  | TZ-1E<br>(e-isomer of<br>picarbutrazox)                                 | 48-h Acute (flow through)                 | 48-h EC <sub>50</sub>                  | > 0.31 mg a.i./L<br>No effects on mobility<br>were observed up to the<br>highest test<br>concentration | Highly<br>toxic                 | 2809441 |
|                                  | TZ-2  | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | 5.6 mg/L   | Moderately toxic                | 2809443 |
|                                  | TY-3  | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | 50 mg/L  | Slightly<br>toxic               | 2809445 |
|                                  | TZ-4  | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | > 31 mg/L<br>No effects on mobility<br>were observed up to the<br>highest test<br>concentration        | Slightly<br>toxic               | 2809447 |
|                                  | TZ-5  | 48-h Acute (static)                       | 48-h EC <sub>50</sub>                  | > 88 mg/L<br>5% immobility was<br>observed at the highest<br>test concentration                        | Slightly<br>toxic               | 2809450 |
| Chironomus<br>dilutes<br>(Midge) | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 10-d Acute<br>(spiked<br>sediment)        | 10-d EC <sub>50</sub>                  | Pore water: > 0.333 mg a.i./L No mortality was observed up to the highest test concentration           | NA                              | 2809461 |

| Test<br>organism                    | Test substance   | Exposure                            | Endpoint              | Endpoint Value  | Degree of toxicity <sup>1</sup> | PMRA#                   |
|-------------------------------------|--|-------------------------------------|-----------------------|---|---------------------------------|-------------------------|
| Hyalella<br>Azteca<br>(Amphipod)    | Picarbutrazox<br>(technical<br>grade active<br>ingredient)                       | 10-d acute<br>(spiked<br>sediment)  | 10-d LC <sub>50</sub> | Pore water: > 0.333 mg a.i./L 5% mortality was observed at the highest test concentration   | NA                              | 2809463                 |
| Freshwater Fi                       | sh   |                                     |                       |   |                                 |                         |
| Oncorhynchus mykiss (Rainbow Trout) | Picarbutrazox<br>(technical<br>grade active<br>ingredient)                       | 96-h<br>Flow-<br>through            | 96-h LC <sub>50</sub> | > 0.29 mg a.i./L<br>No mortality was<br>observed up to the<br>highest test<br>concentration | Highly<br>toxic                 | 2809482<br>&<br>2809504 |
|                                     | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)           | 96-h<br>Static                      | 96-h LC <sub>50</sub> | > 2.33 mg a.i./L<br>10% mortality was<br>observed at the highest<br>test concentration      | Moderately toxic                | 2809494<br>&<br>2809506 |
|                                     | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox)          | 96-h<br>Static                      | 96-h LC <sub>50</sub> | > 3.74 mg a.i./L<br>5% mortality was<br>observed at the highest<br>test concentration       | Moderately toxic                | 2809496<br>&<br>2809506 |
|                                     | Picarbutrazox<br>FS 400<br>formulated<br>product (36.3%<br>w/w<br>picarbutrazox) | 96-h<br>Static                      | 96-h LC <sub>50</sub> | > 8.14 mg a.i./L<br>No mortality was<br>observed up to the<br>highest test<br>concentration | Moderately toxic                | 2809498                 |
|                                     | TZ-1E  | 96-h Flow-<br>through               | 96-h LC <sub>50</sub> | > 0.337 mg/L<br>No mortality was<br>observed up to the<br>highest test<br>concentration     | Highly<br>toxic                 | 2809484                 |
|                                     | TZ-2   | 96-h<br>Static                      | 96-h LC <sub>50</sub> | > 13 mg/L<br>No mortality was<br>observed up to the<br>highest test<br>concentration        | Slightly<br>toxic               | 2809486                 |
|                                     | TY-3   | 96-h<br>Daily<br>Static-<br>Renewal | 96-h LC <sub>50</sub> | 2.2 mg/L  | Moderately toxic                | 2809488                 |
|                                     | TZ-4   | 96-h<br>Static                      | 96-h LC <sub>50</sub> | 33 mg/L   | Slightly<br>toxic               | 2809490                 |
|                                     | TZ-5   | 96-h<br>Static                      | 96-h LC <sub>50</sub> | > 87 mg/L<br>No mortality was<br>observed at the highest<br>test concentration              | Slightly<br>toxic               | 2809492                 |

| Test<br>organism  | Test substance  | Exposure                                     | Endpoint                                    | Endpoint Value   | Degree of toxicity <sup>1</sup> | PMRA#   |
|---|---|--|---|--|---------------------------------|---------|
| Pimephales<br>promelas<br>(Fathead<br>Minnow)           | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 96-h<br>Flow-<br>through                     | 96-h LC <sub>50</sub>                       | > 0.31 mg a.i./L No<br>mortality was observed<br>up to the<br>highest test<br>concentration                | Highly<br>toxic                 | 2809500 |
|   |   | 33-d Early<br>Life-Stage<br>Flow-<br>through | 33-d<br>NOEC <sub>larval</sub><br>survival: | 0.019 mg a.i./L  | NA                              | 2809510 |
| Vascular plant  |   |  |   |  |                                 |         |
| Lemna gibba<br>(Duckweed)                               | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 7-d<br>Static-<br>renewal                    | 7-d IC <sub>50</sub> :                      | > 0.314 mg a.i./L<br>No adverse effects up to<br>the<br>highest test<br>concentration                      | NA                              | 2809572 |
| Freshwater alg  | ga  |  |   |  |                                 |         |
| Pseudo-<br>kirchneriella<br>subcapitata<br>(Green Alga) | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | > 0.338 mg a.i./L<br>34% inhibition was<br>observed at the highest<br>test concentration                   |                                 | 2809538 |
| (Green Alga)  | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)  | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | >1.3 mg a.i./L<br>16% inhibition was<br>observed at the highest<br>test concentration                      | NA                              | 2809554 |
|   | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox) | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | > 2.5 mg a.i./L<br>59% inhibition was<br>observed at the highest<br>test concentration of 5.1<br>mg a.i./L | NA                              | 2809552 |
|   | TZ-1E   | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | >0.366 mg a.i./L<br>6% inhibition was<br>observed at the highest<br>test concentration                     | NA                              | 2809542 |
|   | TZ-2  | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | 6.51 mg/L  | NA                              | 2809544 |
|   | TZ-4  | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | 20 mg/L  | NA                              | 2809548 |
|   | TZ-5  | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | > 97 mg/L<br>12% inhibition was<br>observed at the highest<br>test concentration                           | NA                              | 2809550 |
|   | TY-3  | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | 4.6 mg/L   | NA                              | 2809546 |
| Anabaena<br>flos-aquae<br>(Blue-green<br>alga)          | Picarbutrazox<br>(technical<br>grade active<br>ingredient)              | 96-h<br>Static                               | 96-h IC <sub>50</sub> :                     | > 0.27 mg a.i./L<br>30% inhibition was<br>observed at the highest<br>test concentration                    | NA                              | 2809556 |

| Test<br>organism                                       | Test substance   | Exposure   | Endpoint                | Endpoint Value   | Degree of toxicity <sup>1</sup> | PMRA#   |  |  |
|--|--|--|-------------------------|--|---------------------------------|---------|--|--|
| Navicula<br>pelliculosa<br>(Freshwater<br>diatom alga) | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 96-h<br>Static                                   | 96-h IC <sub>50</sub> : | > 0.326 mg a.i./L<br>25% inhibition was<br>observed at the highest<br>test concentration                             | NA                              | 2809540 |  |  |
| Marine Invertebrates                                   |  |  |                         |  |                                 |         |  |  |
| Americamysis<br>bahia<br>(Mysid<br>shrimp)             | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 96-h<br>Flow-<br>through                         | 96-h LC <sub>50</sub>   | > 0.31 mg a.i./L<br>5% mortality was<br>observed at the highest<br>test concentration                                | Highly<br>toxic                 | 2809466 |  |  |
|  |  | 28-d Flow-<br>through                            | 28-d<br>NOAEC           | < 0.0176 mg/L<br>23% mortality was<br>observed at the lowest<br>test concentration of<br>0.0176 mg/L                 | Highly<br>toxic                 | 2809472 |  |  |
| Crassostrea virginica (Eastern oyster)                 | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 96-h<br>Flow-<br>through                         | 96-h IC <sub>50</sub>   | > 0.28 mg a.i./L<br>35% reduction in shell<br>depositon was observed<br>at the highest test<br>concentration         | Highly<br>toxic                 | 2809470 |  |  |
| Leptocheirus<br>plumulosus<br>(Marine<br>Amphipod)     | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 10-d<br>Spiked<br>sediment                       | 10-d LC <sub>50</sub>   | Bulk sediment: > 942 mg a.i./kg Pore water: > 0.333 mg/L No mortality was observed at the highest test concentration | NA                              | 2809468 |  |  |
| Marine Fish  |  |  |                         |  |                                 |         |  |  |
| Cyprinodon<br>variegatus<br>(Sheepshead<br>Minnow)     | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 96-h<br>Flow-<br>through                         | 96-h LC <sub>50</sub> : | > 0.26 mg a.i./L<br>No mortality was<br>observed up to the<br>highest test<br>concentration                          | Highly<br>toxic                 | 2809508 |  |  |
|  |  | 34-d<br>Early Life-<br>Stage<br>Flow-<br>through | 34-d<br>NOAEC:          | 0.077 mg a.i./L  | NA                              | 2809512 |  |  |
| Marine Alga  |  |  |                         |  |                                 |         |  |  |
| Skeletonema<br>costatum<br>(Marine diatom)             | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 96-h<br>Static                                   | 96-h IC <sub>50</sub> : | > 0.236 mg a.i./L<br>34% inhibition was<br>observed at the highest<br>test concentration                             | NA                              | 2809562 |  |  |

Degree of toxicity classification based on criteria developed by Atkins et al. for bees and USEPA for others, where applicable.

Table 14 Study endpoints and uncertainty factors used to establish effects metrics for risk assessment

| Most sensitive representitive species | Test substance     | Exposure/endpoint                     | Endpoint value                  | Uncertainty<br>factor<br>applied | Level of concern (LOC) |
|---------------------------------------|--------------------|---------------------------------------|---------------------------------|----------------------------------|------------------------|
| Invertebrates                         |                    |                                       |                                 |                                  |                        |
| Earthworm (Eisenia fetida)            | Picarbutrazox a.i. | 28d-LC <sub>50</sub>                  | > 1000<br>mg a.i./kg<br>soil dw | 2                                | 1                      |
|                                       |                    | 56-d Reproduction<br>NOAEC            | 96 mg<br>a.i./kg soil<br>dw     | 1                                | 1                      |
|                                       | TZ-1E              | 28d-LC <sub>50</sub>                  | > 1100<br>mg a.i./kg<br>soil dw | 2                                | 1                      |
|                                       |                    | 56-d Reproduction<br>NOAEC            | 1100 mg<br>a.i./kg soil<br>dw   | 1                                | 1                      |
|                                       | TZ-2               | 28d-LC <sub>50</sub>                  | >1000<br>mg/kg<br>soil dw       | 2                                | 1                      |
|                                       |                    | 56-d Reproduction<br>NOAEC            | 560<br>mg/kg<br>soil dw         | 1                                | 1                      |
|                                       | TZ-5               | 28d-LC <sub>50</sub>                  | >1000<br>mg/kg<br>soil dw       | 2                                | 1                      |
|                                       |                    | 56-d Reproduction<br>NOAEC            | 64 mg/kg<br>soil dw             | 1                                | 1                      |
| Birds                                 |                    |                                       |                                 |                                  |                        |
| Mallard<br>(Anas platyrhynchos)       | Picarbutrazox a.i. | Single dose Oral LD <sub>50</sub>     | > 2000<br>mg a.i./kg<br>bw      | 10                               | 1                      |
|                                       |                    | 27 week<br>Reproduction<br>NOAEL      | 41.8 mg<br>a.i./kg<br>bw/d      | 1                                | 1                      |
| Mammals                               |                    |                                       |                                 |                                  | 1                      |
| Sprague Dawley rat                    | Picarbutrazox a.i. | Single dose Oral LD <sub>50</sub>     | > 2000<br>mg a.i./kg<br>bw      | 10                               | 1                      |
| Sprague Dawley rat                    | Picarbutrazox a.i. | 1 Generation<br>Reproductive<br>NOAEL | 45.1<br>mg/kg<br>bw/day         | 1                                | 1                      |
| Freshwater invertebr                  | ates               |                                       | 1                               | L                                |                        |
| Water flea (Daphnia magna)            | Picarbutrazox a.i. | 48-h EC <sub>50</sub>                 | > 0.28 mg<br>a.i./L             | 2                                | 1                      |

| Most sensitive representitive species | Test substance   | Exposure/endpoint          | Endpoint value                | Uncertainty<br>factor<br>applied | Level of concern (LOC) |
|---------------------------------------|--|----------------------------|-------------------------------|----------------------------------|------------------------|
|                                       | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)           | 48-h EC <sub>50</sub>      | > 1.89 mg<br>a.i./L           | 2                                | 1                      |
|                                       | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox)          | 48-h EC <sub>50</sub>      | > 3.46 mg<br>a.i./L           | 2                                | 1                      |
|                                       | TZ-1E (e-isomer of picarbutrazox)  | 48-h EC <sub>50</sub>      | > 0.31 mg<br>a.i./L           | 2                                | 1                      |
|                                       | TZ-2   | 48-h EC <sub>50</sub>      | 5.6 mg/L                      | 2                                | 1                      |
|                                       | TY-3   | 48-h EC <sub>50</sub>      | 50 mg/L                       | 2                                | 1                      |
|                                       | TZ-4   | 48-h EC <sub>50</sub>      | > 31 mg/L                     | 2                                | 1                      |
|                                       | TZ-5   | 48-h EC <sub>50</sub>      | > 88 mg/L                     | 2                                | 1                      |
|                                       | Picarbutrazox a.i.   | 21 day life-cycle<br>NOAEL | 0.13 mg<br>a.i./L             | 1                                | 1                      |
| Midge (Chironomus dilutes)            | Picarbutrazox a.i.   | 10-d EC <sub>50</sub>      | Pore water: > 0.333 mg a.i./L | 2                                | 1                      |
| Freshwater fish                       | _  |                            | _                             |                                  |                        |
| Rainbow trout (Oncorhynchus           | Picarbutrazox a.i.   | 96h-LC <sub>50</sub>       | > 0.29 mg<br>a.i./L           | 10                               | 1                      |
| mykiss)                               | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)           | 96h-LC <sub>50</sub>       | > 2.33 mg<br>a.i./L           | 10                               | 1                      |
|                                       | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox)          | 96h-LC <sub>50</sub>       | > 3.74 mg<br>a.i./L           | 10                               | 1                      |
|                                       | Picarbutrazox<br>FS 400<br>formulated<br>product (36.3%<br>w/w<br>picarbutrazox) | 96h-LC <sub>50</sub>       | > 8.14 mg<br>a.i./L           | 10                               | 1                      |
|                                       | TZ-1E  | 96h-LC <sub>50</sub>       | > 0.337<br>mg/L               | 10                               | 1                      |
|                                       | TZ-2   | 96h-LC <sub>50</sub>       | > 13 mg/L                     | 10                               | 1                      |

| Most sensitive representitive species              | Test substance  | Exposure/endpoint              | Endpoint value        | Uncertainty<br>factor<br>applied | Level of concern (LOC) |
|--|---|--------------------------------|-----------------------|----------------------------------|------------------------|
|  | TY-3  | 96h-LC <sub>50</sub>           | 2.2 mg/L              | 10                               | 1                      |
|  | TZ-4  | 96h-LC <sub>50</sub>           | 33 mg/L               | 10                               | 1                      |
|  | TZ-5  | 96h-LC <sub>50</sub>           | >87 mg/L              | 10                               | 1                      |
| Fathead minnow (Pimephales promelas)               | Picarbutrazox<br>(technical grade<br>active<br>ingredient)              | 33-d Early Life-<br>Stage NOEC | 0.019 mg<br>a.i./L    | 1                                | 1                      |
| Aquatic vascular plan                              | its   |                                |                       |                                  |                        |
| Duckweed (Lemna gibba)                             | Picarbutrazox<br>(technical grade<br>active<br>ingredient)              | 7-d IC <sub>50</sub>           | > 0.314<br>mg a.i./L  | 2                                | 1                      |
| Freshwater Algae                                   | , ,   |                                | 1                     | l                                | l .                    |
| Green alga<br>(Pseudokirchneriella<br>subcapitata) | Picarbutrazox<br>(technical grade<br>active<br>ingredient)              | 96-h IC <sub>50</sub>          | > 0.338<br>mg a.i./L  | 2                                | 1                      |
|  | Picarbutrazox<br>formulated<br>product (9.61%<br>w/w<br>picarbutrazox)  | 96-h IC <sub>50</sub>          | > 1.3 mg<br>a.i./L    | 2                                | 1                      |
|  | Picarbutrazox<br>formulated<br>product<br>(20.26% w/w<br>picarbutrazox) | 96-h IC <sub>50</sub>          | > 2.5 mg<br>a.i./L    | 2                                | 1                      |
|  | TZ-1E   | 96-h IC <sub>50</sub>          | > 0.3666<br>mg a.i./L | 2                                | 1                      |
|  | TZ-2  | 96-h IC <sub>50</sub>          | 6.51 mg/L             | 2                                | 1                      |
|  | TZ-4  | 96-h IC <sub>50</sub>          | 20 mg/L               | 2                                | 1                      |
|  | TZ-5  | 96-h IC <sub>50</sub>          | > 94 mg/L             | 2                                | 1                      |
|  | TY-3  | 96-h IC <sub>50</sub>          | 4.6 mg/L              | 2                                | 1                      |
| Blue-green alga<br>(Anabaena flos-<br>aquae)       | abaena flos-  |                                | > 0.27 mg<br>a.i./L   | 2                                | 1                      |
| Saltwater invertebrat                              |   | T                              |                       | T                                | I                      |
| Mysid shrimp (Americamysis bahia)                  | Picarbutrazox<br>(technical grade<br>active<br>ingredient)              | 28-d NOEC                      | < 0.0176<br>mg a.i./L | 1                                | 1                      |
| Eastern oyster (Crassostrea virginica)             | Picarbutrazox<br>(technical grade<br>active<br>ingredient)              | 96-h IC <sub>50</sub>          | > 0.28 mg<br>a.i./L   | 2                                | 1                      |

| Most sensitive representitive species             | Test substance   | Exposure/endpoint     | Endpoint value       | Uncertainty<br>factor<br>applied | Level of concern (LOC) |
|---|--|-----------------------|----------------------|----------------------------------|------------------------|
| Marine amphipod ( <i>Leptocheirus</i> plumulosus) | Picarbutrazox (technical grade active                      | 10-d LC <sub>50</sub> | Pore water: > 0.333  | 2                                | 1                      |
| Saltwater fish                                    | ingredient)  |                       | mg a.i./L            |                                  |                        |
| Sheepshead minnow (Cyprinodon                     | Picarbutrazox (technical grade                             | 96-h LC <sub>50</sub> | > 0.26 mg<br>a.i./L  | 2                                | 1                      |
| variegatus)                                       | active ingredient)   | 34-d NOEC             | 0.077 mg<br>a.i./L   | 1                                | 1                      |
| Saltwater algae                                   |  |                       |                      |                                  |                        |
| Marine diatom<br>(Skeletonema<br>costatum)        | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 96-h IC <sub>50</sub> | > 0.236<br>mg a.i./L | 2                                | 1                      |

Table 15 Seed treatment screening level terrestrial organisms risk assessment: Earthworms, pollinators and arthropods from seed treatment

| Most sensitive representative species | Test<br>Substance  | Exposure     | Effect<br>metric  | EEC1   | $RQ^2$    | Level of Concern <sup>3</sup> |
|---------------------------------------|--|--------------|---|--|-----------|-------------------------------|
| Invertebrates                         |  |              |   |  |           |                               |
| Earthworm (Eisenia fetida)            | Picarbutrazox<br>(technical<br>grade active<br>ingredient) | 28-d Chronic | LC <sub>50</sub> /2 <sup>4</sup> :<br>>500 mg<br>a.i./kg soil<br>dw | mg<br>a.i./kg<br>soil <sup>5</sup>           | <0.000002 | Not<br>exceeded               |
|                                       |  | 56-d Chronic | NOEC <sub>repro</sub> /1:<br>96 mg a.i./kg<br>soil dw               | 0.0012<br>mg<br>a.i./kg<br>soil              | 0.000013  | Not<br>exceeded               |
|                                       | TZ-1E  | 28-d Chronic | LC <sub>50</sub> /2: >550<br>mg a.i./kg<br>soil dw                  | 0.0012 <sup>6</sup><br>mg<br>a.i./kg<br>soil | <0.000002 | Not<br>exceeded               |
|                                       |  | 56-d Chronic | NOEC <sub>repro</sub> /1:<br>1100 mg<br>a.i./kg soil<br>dw          | 0.0012<br>mg<br>a.i./kg<br>soil              | 0.000001  | Not<br>exceeded               |
|                                       | TZ-2   | 28-d Chronic | LC <sub>50</sub> /2: >500<br>mg/kg soil<br>dw                       | 0.0009<br>mg<br>a.i./kg<br>soil              | <0.000002 | Not<br>exceeded               |
|                                       |  | 56-d Chronic | NOEC <sub>repro</sub> /1:<br>560 mg/kg<br>soil dw                   | 0.0009<br>mg<br>a.i./kg<br>soil              | 0.000002  | Not<br>exceeded               |

| Most sensitive representative species              | Test<br>Substance                                    | Exposure                             | Effect<br>metric   | EEC1                            | RQ <sup>2</sup> | Level of Concern <sup>3</sup> |
|--|--|--------------------------------------|--|---------------------------------|-----------------|-------------------------------|
|  | TZ-5   | 28-d Chronic                         | LC <sub>50</sub> /2: >500<br>mg/kg soil<br>dw            | 0.0006<br>mg<br>a.i./kg<br>soil | <0.000001       | Not<br>exceeded               |
|  |  | 56-d Chronic                         | NOEC <sub>repro</sub> /1:<br>64 mg/kg<br>soil dw         | 0.0006<br>mg<br>a.i./kg<br>soil | 0.00001         | Not<br>exceeded               |
| Soil dwelling predatory mite (Hypoaspis geolaelaps | Picarbutrazox<br>formulated<br>product<br>(36.3% w/w | 14-d<br>Reproduction<br>test in soil | LR <sub>50</sub> /1: > 363 mg<br>a.i./kg dry<br>soil     | 0.0012<br>mg<br>a.i./kg<br>soil | <<br>0.000003   | Not<br>exceeded               |
| aculeifer)   | picarbutrazox)                                       |                                      | ER <sub>50</sub> /1: > 363 mg<br>a.i./kg dry<br>soil     | 0.0012<br>mg<br>a.i./kg<br>soil | < 0.00003       | Not<br>exceeded               |
|  | TZ-1E  | 14-d<br>Reproduction<br>test in soil | LR <sub>50</sub> /1: ><br>1000 mg<br>a.i./kg dry<br>soil | 0.0012<br>mg<br>a.i./kg<br>soil | <<br>0.000001   | Not<br>exceeded               |
|  |  |                                      | ER <sub>50</sub> /1:<br>>1000 mg<br>a.i./kg dry<br>soil  | 0.0012<br>mg<br>a.i./kg<br>soil | <<br>0.000001   | Not<br>exceeded               |
|  | TZ-2   | 14-d<br>Reproduction<br>test in soil | LR <sub>50</sub> /1: ><br>1000 mg<br>a.i./kg dry<br>soil | 0.0009<br>mg<br>a.i./kg<br>soil | <<br>0.000001   | Not<br>exceeded               |
|  |  |                                      | ER <sub>50</sub> /1: > 1000 mg a.i./kg dry soil          | 0.0009<br>mg<br>a.i./kg<br>soil | <<br>0.000002   | Not<br>exceeded               |
|  | TZ-5   | 14-d<br>Reproduction<br>test in soil | LR <sub>50</sub> /1: ><br>1000 mg<br>a.i./kg dry<br>soil | 0.0006<br>mg<br>a.i./kg<br>soil | <<br>0.000001   | Not<br>exceeded               |
| EEC - Estimated I                                  |  |                                      | ER <sub>50</sub> /1:<br>>1000 mg<br>a.i./kg dry<br>soil  | 0.0006<br>mg<br>a.i./kg<br>soil | <<br>0.000001   | Not<br>exceeded               |

<sup>&</sup>lt;sup>1</sup> EEC = Estimated Environmental Concentration.

 $<sup>^2</sup>$  RQ = Risk Quotient. The RQ is calculated by dividing the EEC by the endpoint value (RQ = EEC/endpoint value)  $^3$ Level of concern. The RQ is compared to the level of concern (LOC = 2 for predators and parasites and 1 for all other species). If the screening level risk quotient is below the level of concern, the risk is considered acceptable and no further risk characterization is necessary. For groups where the level of concern (LOC) is exceeded (RQ  $\geq$  1), further characterization of the risk is conducted.

<sup>&</sup>lt;sup>4</sup>For acute toxicity studies, uncertainty factors of 1/2 of the EC<sub>50</sub> (LC<sub>50</sub>) are typically used in modifying the toxicity

values for terrestrial invertebrates, and 1/10 of the EC<sub>50</sub> (LC<sub>50</sub>) are typically used in modifying the toxicity values for birds and mammals when calculating risk quotients. No uncertainty factors are used to modify bee toxicity values or chronic NOEC endpoints.

<sup>5</sup>The soil EEC of 0.0012 mg a.i./kg soil was calculated based on the proposed seed treatment rate of 2.5 g a.i./100 kg seed for soybean seed, a seeding rate of 109 kg soybean seed/ha and accounting for soil degradation using the 90<sup>th</sup> upper percentile on the mean of the aerobic soil representative half-lives of 64 days. This concentration was calculated assuming that the product is evenly distributed in the top 0 to 15 cm depth of soil with a bulk density of 1.5 g/cm<sup>3</sup>.

Table 16 Consumption of treated seed screening level risk assessment for birds and mammals

|                         | Toxicity (mg a.i./kg bw/d) | EDE <sup>1</sup><br>(mg a.i./kg<br>bw/day) | $\mathbb{R}\mathbb{Q}^2$ | Level of<br>Concern <sup>3</sup> |  |  |
|-------------------------|----------------------------|--|--------------------------|----------------------------------|--|--|
| Small bird (0.02 kg)    |                            |  |                          |                                  |  |  |
| Acute                   | 200.00                     | 12.697                                     | 0.1                      | Not Exceeded                     |  |  |
| Reproduction            | 41.80                      | 12.697                                     | 0.3                      | Not Exceeded                     |  |  |
| Medium bird (0.10 kg)   | )                          |  |                          |                                  |  |  |
| Acute                   | 200.00                     | 9.974                                      | 0.05                     | Not Exceeded                     |  |  |
| Reproduction            | 41.80                      | 9.974                                      | 0.2                      | Not Exceeded                     |  |  |
| Large bird (1.00 kg)    |                            |  |                          |                                  |  |  |
| Acute                   | 200.00                     | 2.908                                      | 0.01                     | Not Exceeded                     |  |  |
| Reproduction            | 41.80                      | 2.908                                      | 0.1                      | Not Exceeded                     |  |  |
| Small mammals (0.015    | 5 kg)                      |  |                          |                                  |  |  |
| Acute                   | 20.00                      | 7.256                                      | 0.4                      | Not Exceeded                     |  |  |
| Reproduction            | 45.10                      | 7.256                                      | 0.2                      | Not Exceeded                     |  |  |
| Medium mammals (0.      | 035 kg)                    |  |                          |                                  |  |  |
| Acute                   | 20.00                      | 6.240                                      | 0.3                      | Not Exceeded                     |  |  |
| Reproduction            | 45.10                      | 6.240                                      | 0.1                      | Not Exceeded                     |  |  |
| Large mammals (1.00 kg) |                            |  |                          |                                  |  |  |
| Acute                   | 20.00                      | 3.436                                      | 0.2                      | Not Exceeded                     |  |  |
| Reproduction            | 45.10                      | 3.436                                      | 0.1                      | Not Exceeded                     |  |  |

 $^{\rm I}$ EDE = Estimated dietary exposure. Screening level EDEs were calculated based on the proposed seed treatment rate of 5.0 g a.i./100 kg seed for corn seed and a seeding rate of 3.15 kg corn seed/ha. The EDE is calculated using the following formula: (FIR/BW) × EEC, where: FIR = Food Ingestion Rate and BW = Body weight. For generic birds with body weight less than or equal to 200 g, the "passerine" equation was used; for generic birds with body weight greater than 200 g, the "all birds" equation was used: Passerine Equation (body weight < or = 200 g): FIR (g dry weight/day) = 0.398(BW in g)<sup>0.850</sup>. All birds Equation (body weight > 200 g): FIR (g dry weight/day) = 0.648(BW in g)<sup>0.651</sup>. For mammals, the "all mammals" equation was used: FIR (g dry weight/day) = 0.235(BW in g)<sup>0.822</sup>

<sup>&</sup>lt;sup>6</sup> EECs for transformation products were calculated conservatively assuming that 100% of the applied picarbutrazox active ingredient was instantly transformed into the transformation product on a molecular weight/weight basis.

 $<sup>^2</sup>$  RQ = Risk Quotient. The RQ is calculated by dividing the EEC by the endpoint value (RQ = EEC/endpoint value)  $^3$ Level of concern. The RQ is compared to the level of concern (LOC = 1 for birds and mammals). If the screening level risk quotient is below the level of concern, the risk is considered acceptable and no further risk characterization is necessary. For groups where the level of concern (LOC) is exceeded (RQ  $\geq$  1), further characterization of the risk is conducted.

Table 17 Screening level risk assessment of picarbutrazox, its end-use product and its transformation products to aquatic organisms from seed treatment

| Most sensitive representitive species | Test substance   | Exposure                   | Effects<br>metric <sup>1</sup>                | EEC <sup>2</sup>                 | Risk<br>quotient <sup>3</sup> | Level of concern <sup>4</sup> |
|---------------------------------------|--|----------------------------|---|----------------------------------|-------------------------------|-------------------------------|
| Freshwater inver                      | tebrates   |                            | T =   |                                  |                               |                               |
| Water flea (Daphnia magna)            | Picarbutrazox (technical grade   | 48-h Acute                 | EC <sub>50</sub> /2:<br>> 0.14 mg<br>a.i./L   | 0.0003 mg<br>a.i./L              | < 0.003                       | Not<br>Exceeded               |
|                                       | active ingredient)   | 21 day life-<br>cycle      | NOAEC/1:<br>0.13 mg<br>a.i./L                 | 0.0003 mg<br>a.i./L              | 0.003                         | Not<br>Exceeded               |
|                                       | TZ-1E<br>(e-isomer of<br>picarbutrazox)  | 48-h Acute                 | EC <sub>50</sub> /2:<br>> 0.155 mg<br>a.i./L  | 0.0003 mg<br>a.i./L              | < 0.003                       | Not<br>Exceeded               |
|                                       | TZ-2   | 48-h Acute                 | EC <sub>50</sub> /2:<br>2.8 mg/L              | 0.0002 mg<br>a.i./L              | 0.0001                        | Not<br>Exceeded               |
|                                       | TZ-4   | 48-h Acute                 | EC <sub>50</sub> /2: > 15.5 mg/L              | 0.0001 mg<br>a.i./L              | < 0.00001                     | Not<br>Exceeded               |
|                                       | TZ-5   | 48-h Acute                 | EC <sub>50</sub> /2: > 44 mg/L                | 0.0001 mg<br>a.i./L              | < 0.000005                    | Not<br>Exceeded               |
|                                       | TY-3   | 48-h Acute                 | EC <sub>50</sub> /2:<br>25 mg/L               | 0.0002 mg<br>a.i./L              | 0.00001                       | Not<br>Exceeded               |
| Midge<br>(Chironomus<br>dilutes)      | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 10-d<br>spiked<br>sediment | EC <sub>50</sub> /2:<br>> 0.166 mg<br>a.i./L  | 0.0024 mg<br>a.i./L <sup>5</sup> | < 0.01                        | Not<br>Exceeded               |
| Freshwater fish                       |  |                            |   |                                  |                               |                               |
| Rainbow Trout (Oncorhynchus mykiss)   | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 96-h<br>Flow-<br>through   | LC <sub>50</sub> /10:<br>>0.029 mg<br>a.i./L  | 0.0003 mg<br>a.i./L              | < 0.01                        | Not<br>Exceeded               |
|                                       | Picarbutrazox<br>FS 400<br>formulated<br>product (36.3%<br>w/w<br>picarbutrazox) | 96-h<br>Static             | LC <sub>50</sub> /10:<br>> 8. 14 mg<br>a.i./L | 0.0003 mg<br>a.i./L              | < 0.0004                      | Not<br>Exceeded               |
|                                       | TZ-1E  | 96-h<br>Flow-<br>through   | LC <sub>50</sub> /10:<br>>0.0377 mg<br>a.i./L | 0.0003 mg<br>a.i./L              | < 0.01                        | Not<br>Exceeded               |
|                                       | TZ-2   | 96-h<br>Static             | LC <sub>50</sub> /10:<br>>1.3 mg/L            | 0.0002 mg<br>a.i./L              | < 0.0002                      | Not<br>Exceeded               |
|                                       | TZ-4   | 96-h<br>Static             | LC <sub>50</sub> /10: 3.3<br>mg/L             | 0.0001 mg<br>a.i./L              | 0.00003                       | Not<br>Exceeded               |
|                                       | TZ-5   | 96-h<br>Static             | LC <sub>50</sub> /10:<br>>8.7 mg/L            | 0.0001 mg<br>a.i./L              | < 0.00001                     | Not<br>Exceeded               |

| Most sensitive representitive species                              | Test substance   | Exposure                                     | Effects<br>metric <sup>1</sup>                | EEC <sup>2</sup>     | Risk<br>quotient <sup>3</sup> | Level of concern <sup>4</sup> |
|--|--|--|---|----------------------|-------------------------------|-------------------------------|
|  | TY-3   | 96-h<br>Daily static-<br>renewal             | LC <sub>50</sub> /10:<br>0.22 mg/L            | 0.0002 mg<br>a.i./L  | 0.001                         | Not<br>Exceeded               |
| Fathead minnow (Pimephales promelas)                               | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 33-d Early<br>life-stage<br>flow-<br>through | NOAEC/1:<br>0.019 mg<br>a.i./L                | 0.0003 mg<br>a.i./L  | 0.01                          | Not<br>Exceeded               |
| Amphibians<br>(using rainbow<br>trout fish data as<br>a surrogate) | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 96-h<br>Flow-<br>through                     | LC <sub>50</sub> /10:<br>>0.029 mg<br>a.i./L  | 0.00182<br>mg a.i./L | < 0.1                         | Not<br>Exceeded               |
|  | Picarbutrazox<br>FS 400<br>formulated<br>product (36.3%<br>w/w<br>picarbutrazox) | 96-h<br>Static                               | LC <sub>50</sub> /10:<br>> 8.08 mg<br>a.i./L  | 0.00182<br>mg a.i./L | < 0.002                       | Not<br>Exceeded               |
|  | TZ-1E  | 96-h<br>Flow-<br>through                     | LC <sub>50</sub> /10:<br>>0.0377 mg<br>a.i./L | 0.00182<br>mg a.i./L | < 0.05                        | Not<br>Exceeded               |
|  | TZ-2   | 96-h<br>Static                               | LC <sub>50</sub> /10:<br>>1.3 mg/L            | 0.001 mg<br>a.i./L   | < 0.001                       | Not<br>Exceeded               |
|  | TZ-4   | 96-h<br>Static                               | LC <sub>50</sub> /10: 3.3<br>mg/L             | 0.001 mg<br>a.i./L   | 0.0003                        | Not<br>Exceeded               |
|  | TZ-5   | 96-h<br>Static                               | LC <sub>50</sub> /10: >8.7 mg/L               | 0.001 mg<br>a.i./L   | < 0.0001                      | Not<br>Exceeded               |
|  | TY-3   | 96-h<br>Daily static-<br>renewal             | LC <sub>50</sub> /10:<br>0.22 mg/L            | 0.001 mg<br>a.i./L   | 0.005                         | Not<br>Exceeded               |
| Freshwater vascu   | ılar plants  |  |   |                      |                               |                               |
| Duck weed (Lemna gibba)  | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 7-d static renewal                           | IC <sub>50</sub> /2:<br>> 0.157 mg<br>a.i./L  | 0.0003 mg<br>a.i./L  | < 0.002                       | Not<br>Exceeded               |
| Freshwater algae   |  | T  | 1   |                      |                               |                               |
| Green alga<br>(Pseudokirchneri<br>ella subcapitata)                | Picarbutrazox<br>(technical grade<br>active<br>ingredient)                       | 96-h<br>Static                               | IC <sub>50</sub> /2: > 0.169 mg a.i./L        | 0.0003 mg<br>a.i./L  | < 0.002                       | Not<br>Exceeded               |
|  | TZ-1E  | 96-h<br>Static                               | IC <sub>50</sub> /2: > 0.183 mg a.i./L        | 0.0003 mg<br>a.i./L  | < 0.002                       | Not<br>Exceeded               |
|  | TZ-2   | 96-h<br>Static                               | IC <sub>50</sub> /2:<br>3.255 mg/L            | 0.0002 mg<br>a.i./L  | 0.0001                        | Not<br>Exceeded               |
|  | TZ-4   | 96-h<br>Static                               | IC <sub>50</sub> /2:<br>10 mg/L               | 0.0001 mg<br>a.i./L  | 0.00001                       | Not<br>Exceeded               |

| Most sensitive representitive species              | Test substance   | Exposure                                      | Effects<br>metric <sup>1</sup>               | EEC <sup>2</sup>                 | Risk<br>quotient <sup>3</sup> | Level of concern <sup>4</sup> |
|--|--|---|--|----------------------------------|-------------------------------|-------------------------------|
| _  | TZ-5   | 96-h<br>Static                                | IC <sub>50</sub> /2:<br>> 47 mg/L            | 0.0001 mg<br>a.i./L              | < 0.000002                    | Not<br>Exceeded               |
|  | TY-3   | 96-h<br>Static                                | IC <sub>50</sub> /2:<br>2.3 mg/L             | 0.0002 mg<br>a.i./L              | 0.0001                        | Not<br>Exceeded               |
| Blue-green alga<br>(Anabaena flow-<br>aquae)       | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 96-h<br>Static                                | IC <sub>50</sub> /2:<br>> 0.135 mg<br>a.i./L | 0.0003 mg<br>a.i./L              | < 0.002                       | Not<br>Exceeded               |
| Marine invertebr                                   | ates   |   |  |                                  |                               |                               |
| Mysid shrimp<br>(Americamysis<br>bahia)            | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 28-d Flow-through                             | NOAEC/1:<br>< 0.0176 mg<br>a.i./L            | 0.0003 mg<br>a.i./L              | > 0.02                        | Unlikely<br>to be<br>Exceeded |
| Eastern oyster (Crassostrea virginica)             | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 96-h Flow-through                             | LC <sub>50</sub> /2:<br>> 0.14 mg<br>a.i./L  | 0.0003 mg<br>a.i./L              | < 0.002                       | Not<br>Exceeded               |
| Marine<br>Amphipod<br>(Leptocheirus<br>plumulosus) | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 10-d spiked sediment                          | EC <sub>50</sub> /2:<br>0.166 mg<br>a.i./L   | 0.0024 mg<br>a.i./L <sup>5</sup> | < 0.01                        | Not<br>Exceeded               |
| Marine fish  |  |   | _  |                                  |                               |                               |
| Sheepshead   | Picarbutrazox  | 96-h<br>Flow-<br>through                      | LC <sub>50</sub> /10: > 0.026 mg a.i./L      | 0.0003 mg<br>a.i./L              | < 0.02                        | Not<br>Exceeded               |
| minnow<br>(Cyprinodon<br>variegatus)               | (technical grade active ingredient)                        | 34-d Early<br>Life Stage,<br>Flow-<br>through | NOAEC/1:<br>0.077 mg<br>a.i./L               | 0.0003 mg<br>a.i./L              | 0.004                         | Not<br>Exceeded               |
| Marine alga  |  |   |  |                                  |                               |                               |
| Marine diatom<br>(Skeletonema<br>costatum)         | Picarbutrazox<br>(technical grade<br>active<br>ingredient) | 96-h static                                   | IC <sub>50</sub> /2:<br>> 0.118 mg<br>a.i./L | 0.0003 mg<br>a.i./L              | < 0.003                       | Not<br>Exceeded               |

<sup>&</sup>lt;sup>1</sup>Endpoints were divided by an uncertainty factor to account for varying protection goals (in other words, protection at the community, population, or individual level) For acute toxicity studies, uncertainty factors of 1/2 the EC<sub>50</sub> and 1/10 the LC<sub>50</sub> are typically used in modifying the toxicity values for aquatic organisms when calculating risk quotients. No uncertainty factors are applied to chronic NOEC endpoints.

<sup>&</sup>lt;sup>2</sup>Estimated environmental concentrations (EECs) at the screening level in water bodies 80 cm and 15 cm deep were determined using maximum exposure scenarios for picarbutrazox to achieve the proposed yearly cumulative rate of 2.725 g a.i./ha.

<sup>3</sup>RQ = Risk Quotient. The RQ is calculated by dividing the EEC by the endpoint value (RQ = EEC/endpoint value)

<sup>&</sup>lt;sup>4</sup>LOC = Level of Concern. The RQ is then compared to the level of concern (LOC = 1). If the screening level risk quotient is below the level of concern, the risk is considered negligible and no further risk characterization is necessary.

<sup>&</sup>lt;sup>5</sup>The seed treatment peak pore water EEC of 0.0024 mg a.i./L was conservatively used for the screening level risk assessment of picarbutrazox used as a seed treatment (Table 19).

Table 18 Major fate input parameters for the ecological water modelling

| Fate parameter  | Ecological water  |
|---|---|
| Residues modelled                                       | Picarbutrazox and TZ-1E                                 |
| Adsorption $K_d$ (mL/g)                                 | 24.3 (20 <sup>th</sup> percentile of 6 $K_d$ values for |
|   | picarbutrazox)  |
| Hydrolysis half-life at pH 7 and 20°C (days)            | 21.1  |
| Photolysis half-life in water at 35°N latitude (days)   | 3.0   |
| Aerobic soil biotransformation half-life at 20°C (days) | 64 (90% confidence bound on the mean of 5               |
|   | half-lives)   |
| Aerobic aquatic biotransformation half-life at 20°C     | 85.7 (the longer of two half-lives)                     |
| (days)  |   |
| Anaerobic aquatic biotransformation half-life at 20°C   | 31.7 (the longer of two half-lives)                     |
| (days)  |   |

Table 19 Estimated environmental concentrations of combined residues of picarbutrazox and TZ-1E in aquatic environments from run-off

| Use  | Water<br>depth | Pore water<br>Peak |
|--|----------------|--------------------|
| Seed treatments, modelled as 1 application of 2.725 g a.i./ha per year | 80 cm          | $0.0024^{1,2}$     |

<sup>&</sup>lt;sup>1</sup>Most conservative value chosen for use in the risk assessment for sediment dwelling aquatic organisms <sup>2</sup>Based on modelling input parameters presented in Table 18

Table 20 Toxic substances management policy considerations-comparison to TSMP Track 1 Criteria

| TSMP track 1                  | TSM      | IP track 1              | Endpoin  | ts   |  |
|-------------------------------|----------|-------------------------|--|--|--|
| criteria                      | crite    | rion value              | Picarbutrazox                                    | Transformation products                                  |  |
| CEPA toxic or<br>CEPA         | Yes      |                         | Yes  | Yes  |  |
| toxic equivalent <sup>1</sup> |          |                         |  |  |  |
| Predominantly                 | Yes      |                         | Yes  | Yes  |  |
| anthropogenic <sup>2</sup>    |          |                         |  |  |  |
| Persistence <sup>3</sup>      |          |                         | Laboratory studies                               |  |  |
| 1 disistence                  | Soil     | Half-life ≥ 182         | No: Half-lives of 34.6 to 150                    | Yes: Half-lives of                                       |  |
|                               |          | days                    | days   | 191 to 307 days  |  |
|                               | Water    | Half-life ≥ 182<br>days | No: Total system half-lives of 20.9 to 85.7 days | Yes: Total system<br>half-lives of 77.3 to<br>32400 days |  |
|                               | Sediment | Half-life ≥ 365 days    | No: Total system half-lives of 20.9 to 85.7 days | Yes: Total system<br>half-lives of 77.3 to<br>32400 days |  |

| TSMP track 1                 | TSM   | P track 1  | Endpoin  | ts  |
|------------------------------|---|--|--|---|
| criteria                     | criterion value                               |  | Picarbutrazox  | Transformation products                     |
|                              | Air   | Half-life ≥ 2<br>days, or<br>evidence<br>atmospheric<br>transport to<br>remote regions<br>such as the<br>Arctic. | Unlikely to enter the atmosphere based on the vapour pressure (<1.2 x 10 <sup>-7</sup> Pa at 50°C) and Henry's law constant (<1.5 x 10 <sup>-9</sup> atm m³/mole); therefore, longrange atmospheric transport not expected to be important route of dissipation. | Not applicable                              |
| Bioaccumulation <sup>4</sup> | $\text{Log } K_{\text{OW}} \ge$               | 5  | No: 3.77±0.01  | No: $\leq$ 3.77 based on episuit prediction |
|                              | BCF ≥ 5000                                    |  | No: 342 (Corrected for fish growth and normalised to 5% lipid content)   | Not available                               |
|                              | BAF ≥ 5000                                    | )  | Not available  | Not available                               |
|                              | Is the chemical a TSMP Track 1 substance (all |  | No, does not meet TSMP   | No, does not meet                           |
| four criteria must b         | e met)?                                       |  | Track 1 criteria.  | TSMP Track 1 criteria.                      |

All pesticides will be considered toxic or toxic equivalent as defined by the *Canadian Environmental Protection Act* (CEPA) for the purpose of initially assessing a pesticide against the TSMP criteria. Assessment of the CEPA toxicity criteria may be refined if required (in other words, all other TSMP criteria are met).

Table 21 List of supported use claims for VAYANTIS Seed Treatment

### **Supported Uses**

#### Corn (field, pop, sweet, seed):

Control of seed decay/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. at 2.5 –12.5 mL/100 kg seed:

- 2.5 mL/100 kg seed for fields with a known low level of pre-emergence damping-off;
- ~6.25 mL/100 kg seed for fields with a known higher level of pre-emergence damping-off; and.
- up to 12.5 mL/100 kg seed for fields with a known history of post-emergence damping-off.

## Soybean:

Control of seed decay/pre-emergence damping-off and post-emergence damping-off caused by *Pythium* spp. at 2.5–6.25 mL/100 kg seed:

- 2.5 mL/100 kg seed for fields with a known low level of damping-off; and,
- up to  $6.25~\mathrm{mL}/100~\mathrm{kg}$  seed for fields with a known higher level of pre-emergence damping-off.

The policy considers a substance "predominantly anthropogenic" if, based on expert judgement, its concentration in the environment medium is largely due to human activity, rather than to natural sources or releases.

If the pesticide and/or the transformation product(s) meet one persistence criterion identified for one media (soil, water, sediment or air) than the criterion for persistence is considered to be met.

<sup>&</sup>lt;sup>4</sup> Field data (for example, BAFs) are preferred over laboratory data (for example, BCFs) which, in turn, are preferred over chemical properties (for example, log *K*<sub>OW</sub>).

# Appendix II Supplemental maximum residue limit information – International situation and trade implications

Picarbutrazox is a new active ingredient which is concurrently being registered in Canada and the United States. The MRLs proposed for picarbutrazox in Canada are the same as corresponding tolerances to be promulgated in the United States, except for certain livestock commodities, in accordance with Table 1.

Once established, the American tolerances for picarbutrazox will be listed in the Electronic Code of Federal Regulations, 40 CFR Part 180, by pesticide.

Currently, there are no Codex MRLs<sup>9</sup> listed for picarbutrazox in or on any commodity on the Codex Alimentarius Pesticide Residues in Food website.

 Table 1
 Comparison of Canadian MRLs and American Tolerances (where different)

| Food Commodity  |  | Canadian MRL<br>(ppm) | American Tolerance (ppm) |
|---|--|-----------------------|--------------------------|
| Eggs; fat, meat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep; milk |  | 0.01                  | Not established          |

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns and the locations of the field crop trials used to generate residue chemistry data. For animal commodities, differences in MRLs can be due to different livestock feed items and practices.

The Codex Alimentarius Commission is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

## References

PMRA References

Document Number

# A. List of Studies/Information Submitted by Registrant

# 1.0 Chemistry

| 2808241 | 2017, Applicant DER - Method Validation of Picarbutrazox (NF-171) and         |
|---------|---|
|         | Metabolites (TY-1, TY-2, TZ-1E, TZ-2, TZ-2E, TZ-4, and TZ-5) in Soil and NF-  |
|         | 171 and Metabolites (TY-2, TZ-1E, TZ-5, TZ-2-B-Glc and TZ-5-Glc) in Grass     |
|         | Clippings using LC-MS/MS, DACO: 12.7.7,12.7.8,8.2.2.1,8.2.2.4                 |
| 2809107 | 2017, Sample of Analytical Stnds And Res of Conc, DACO: 2.1,2.15,2.2,2.3 CBI  |
| 2809108 | 2017, Additional Product Chemistry for Picarbutrazox Technical, DACO:         |
|         | 2.1,2.15,2.2,2.3  |
| 2809109 | 2017, Chemical Abstracts Registry Number, DACO:                               |
|         | 2.11.1,2.11.2,2.11.3,2.11.4,2.12.1,2.3.1,2.4,2.5,2.6,2.7,2.8,2.9 CBI          |
| 2809110 | 2017, Applicant Generated Study Reviews-Chemistry (technical grade active     |
|         | ingredient), DACO: 12.7.2 CBI   |
| 2809111 | 2017, Validation of Analytical Method for Active Ingredient (NF-171) and [CBI |
|         | REMOVED] in Technical Grade NF-171, DACO: 2.13.1,2.13.2                       |
| 2809112 | 2017, Confirmation of Identity, DACO: 2.13.1,2.13.2 CBI                       |
| 2809113 | 2017, Validation of Analytical Method for [CBI REMOVED] in Technical Grade    |
|         | NF-171, DACO: 2.13.1,2.13.2   |
| 2809114 | 2017, Batch Data, DACO: 2.13.3,2.13.4 CBI                                     |
| 2809115 | 2011, Colour, Physical State and Odor of NF -171, DACO: 2.14.1,2.14.2,2.14.3  |
| 2809116 | 2011, Dissociation Constant of NF-171, DACO: 2.14.10                          |
| 2809117 | 2009, Partition Coefficient (n-octanol/water) of DS-7097, DACO: 2.14.11       |
| 2809119 | 2010, Spectra of DS-7097, DACO: 2.14.12                                       |
| 2809120 | 2012, Thermal Stability of NF-171, DACO: 2.14.13                              |
| 2809121 | 2017, Storage Stability Data, DACO: 2.14.14 CBI                               |
| 2809123 | 2011, Melting Point of NF-171, DACO: 2.14.4                                   |
| 2809124 | 2011, Boiling Point of NF-171, DACO: 2.14.5                                   |
| 2809125 | 2011, Density of NF-171, DACO: 2.14.6   |
| 2809127 | 2009, Water Solubility of DS-7097, DACO: 2.14.7                               |
| 2809135 | 2009, Solubility of DS-7097 in Organic Solvents, DACO: 2.14.8                 |
| 2809136 | 2012, Vapour Pressure of DS-7097, DACO: 2.14.9                                |
| 2809348 | 2017, Validation of Analytical Method for [CBI REMOVED] in Technical Grade    |
|         | NF-171, DACO: 2.13.1  |
| 2899595 | 2018, Batch Data, DACO: 2.13.3 CBI  |
| 2809344 | 2017, Independent Laboratory Validation of an Analytical Method for the       |
|         | Determination of Picarbutrazox (NF-171) and Metabolites (TY-1, TY-2, TZ-1E,   |
|         | TZ-2, TZ-2E, TZ-4, and TZ-5) in Soil, DACO: 8.2.2.1                           |

| 2809345  | 2017, Applicant DER - Independent Laboratory Validation of an Analytical Method for the Determination of Picarbutrazox (NF-171) and Metabolites (TY-1, TY 2, TZ 1F, TZ 2, TZ 2F, TZ 4, and TZ 5) in Soil DACO: 12.7.8 |
|----------|---|
| 2809346  | TY-2, TZ-1E, TZ-2, TZ-2E, TZ-4, and TZ-5) in Soil, DACO: 12.7.8 2016, Analytical Method Verification for the Determination of NF-171 in Natural   |
| 2000247  | and Artificial Sediments, DACO: 8.2.2.2   |
| 2809347  | 2016, Applicant DER - Analytical Method Verification for the Determination of NF-171 in Natural and Artificial Sediments, DACO: 12.7.8  |
| 2809358  | 2017, Method Validation for the Determination of NF-171, TZ-1E and TZ-2 in  |
| 2007330  | surface water by LC-MS/MS, DACO: 8.2.2.3  |
| 2809359  | 2017, Applicant DER - Method Validation for the Determination of NF-171, TZ-  |
| 2007557  | 1E and TZ-2 in surface water by LC-MS/MS, DACO: 12.7.8  |
| 2809360  | 2017, Validation of Residue Analytical Method for Determination of NF-171 and   |
|          | its Metabolites TZ-1E and TZ-2 in Surface Water, DACO: 8.2.2.3  |
| 2809361  | 2017, Applicant DER - Validation of Residue Analytical Method for   |
|          | Determination of NF-171 and its Metabolites TZ-1E and TZ-2 in Surface Water,  |
|          | DACO: 12.7.8  |
| 2809362  | 2015, Analytical Method Verification for the Determination of NF-171, TZ-1e   |
|          | And TZ-2 In Bluegill (Lepomis macrochirus) Edible and Non-Edible Tissues,   |
|          | DACO: 8.2.2.4   |
| 2809363  | 2015, Applicant DER - Analytical Method Verification for the Determination Of   |
|          | NF-171, TZ-1e And TZ-2 In Bluegill ( <i>Lepomis macrochirus</i> ) Edible and Non-   |
|          | Edible Tissues, DACO: 12.7.8  |
| 2809474  | 2017, TZ-2 - Validation of the Analytical Method for the Determination of a Test  |
| ••••     | Substance in Aqueous Solutions, DACO: 8.2.2.3   |
| 2809475  | 2017, Applicant DER - TZ-2 - Validation of the Analytical Method for the  |
| 2000476  | Determination of a Test Substance in Aqueous Solutions, DACO: 12.7.9  |
| 2809476  | 2017, TZ-4 - Validation of the Analytical Method for the Determination of a Test  |
| 2000477  | Substance in Aqueous Solutions, DACO: 8.2.2.3   |
| 2809477  | 2017, Applicant DER - TZ-4 - Validation of the Analytical Method for the Determination of a Test Substance in Aqueous Solutions, DACO: 12.7.9   |
| 2809478  | 2017, TY-3 - Validation of the Analytical Method for the Determination of a Test  |
| 2009470  | Substance in Aqueous Solutions, DACO: 8.2.2.3   |
| 2809479  | 2017, Applicant DER - TY-3 - Validation of the Analytical Method for the  |
| 2007177  | Determination of a Test Substance in Aqueous Solutions, DACO: 12.7.9  |
| 2809480  | 2017, TZ-5 - Validation of the Analytical Method for the Determination of a Test  |
| 2009 100 | Substance in Aqueous Solutions, DACO: 8.2.2.3   |
| 2809481  | 2017, Applicant DER - TZ-5 - Validation of the Analytical Method for the  |
|          | Determination of a Test Substance in Aqueous Solutions, DACO: 12.7.9  |
| 2809502  | 2016, Analytical Method Verification for the Determination of NF-171 and TZ-1e  |
|          | in Freshwater and Saltwater, DACO: 8.2.2.3  |
| 2809503  | 2016, Applicant DER - Analytical Method Verification for the Determination of   |
|          | NF-171 and TZ-1e in Freshwater and Saltwater, DACO: 12.7.8,8.2.2.3  |
| 2808526  | 2017, Description of Starting Materials, DACO: 3.1.1,3.2.1,3.2.2,3.2.3,3.3.1,3.3.2  |
|          | CBI   |
| 2808527  | 2017, Description of Starting Materials, DACO: 3.2.1 CBI  |
| 2808528  | 2017, Description of Starting Materials, DACO: 3.2.1 CBI  |

| 2808529 | 2017, Enforcement Analytical Method, DACO: 3.4.1 CBI                                      |
|---------|---|
| 2808530 | 2017, Enforcement Analytical Method, DACO: 3.4.1,3.4.2 CBI                                |
|         | 2017, Enforcement Analytical Method, DACO: 3.4.1,3.4.2 CBI                                |
| 2808531 |   |
| 2808532 | 2017, Explodability, DACO: 3.5.1,3.5.10,3.5.11,3.5.12,3.5.13,3.5.14,3.5.15,               |
|         | 3.5.2,3.5.3,3.5.6,3.5.7,3.5.8,3.5.9 CBI   |
| 2842452 | 2017, Description of Starting Materials, DACO: 3.1.1,3.2.1,3.2.2,3.2.3,3.3.1,3.3.2        |
|         | CBI   |
| 2842453 | 2017, Description of Starting Materials, DACO: 3.2.1 CBI                                  |
| 2842454 | 2017, Enforcement Analytical Method, DACO: 3.4.1 CBI                                      |
| 2893873 | 2018, Description of the Formulation Process, DACO: 3.2.2 CBI                             |
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| 2.0     | Human and Animal Health   |
|         |   |
| 2809142 | 2010, Acute Oral Toxicity Study of DS-7097 in Rats, DACO: 4.2.1                           |
| 2809144 | 2011, Acute Oral Toxicity Study of TZ-1E (Metabolite of NF-171) in Rats,                  |
|         | DACO: 4.2.1   |
| 2809146 | 2011, Acute Oral Toxicity Study of TZ-2 (Metabolite of NF-171) in Rats, DACO:             |
|         | 4.2.1   |
| 2809148 | 2017, Acute Oral Toxicity Study of TZ-2 in Rats, DACO: 4.2.1                              |
| 2809150 | 2013, Acute Oral Study Toxicity of TZ-2E in Rats, DACO: 4.2.1                             |
| 2809155 | 2013, Acute Oral Toxicity Study of TZ-4 in Rats, DACO: 4.2.1                              |
| 2809160 | 2013, Acute Oral Toxicity Study of TZ-5 in Rats, DACO: 4.2.1                              |
| 2809162 | 2013, Acute Oral Toxicity Study of TY-2 in Rats, DACO: 4.2.1                              |
| 2809164 | 2013, Acute Oral Toxicity Study of BPOH-NF-171 in Rats, DACO: 4.2.1                       |
| 2809166 | 2013, Acute Oral Toxicity Study of Me-NF-171 in Rats, DACO: 4.2.1                         |
|         |   |
| 2809168 | 2010, Acute Dermal Toxicity Study of DS-7097 in Rats, DACO: 4.2.2                         |
| 2809170 | 2013, NF-171: Acute (Four-Hour) Inhalation Study in Rats, DACO: 4.2.3                     |
| 2809172 | 2017, NF-171: Toxicity Study by Inhalation Administration to Rats for 1 Week, DACO: 4.2.3 |
| 2000175 |   |
| 2809175 | 2014, An Eye Irritation Study of NF-171 in Rabbits, DACO: 4.2.4                           |
| 2809177 | 2014, A Skin Irritation Study of NF-171 in Rabbits, DACO: 4.2.5                           |
| 2809179 | 2011, Skin Sensitization Study of NF-171 in Guinea Pigs (Maximization Test), DACO: 4.2.6  |
| 2000102 |   |
| 2809193 | 2011, NF-171: Toxicity Study by Dietary Administration to CD Rats for 13                  |
| •       | weeks, DACO: 4.3.1  |
| 2809196 | 2010, DS-7097 - 90-Day Repeated Dose Oral Toxicity Study in Rats, DACO:                   |
|         | 4.3.1   |
| 2809200 | 2011, NF-171: Preliminary Carcinogenicity Study by Dietary Administration to              |
|         | CD-1 Mice for 13 Weeks, DACO: 4.3.1   |
| 2809203 | 2014, NF-171 TZ-1E Isomer: Toxicity Study By Dietary Administration To                    |
|         | Sprague-Dawley Rats For 13 Weeks, DACO: 4.3.1   |
| 2809206 | 2017, TZ-5 - 90-Day Repeated Dose Oral Toxicity Study in Rats, DACO: 4.3.1                |
| 2809208 | 2014, A 13-Week Dietary Toxicity Study in Beagle Dogs, DACO: 4.3.2                        |
| 2809210 | 2013, NF-171: A 12-Month Dietary Toxicity Study in Beagle Dogs, DACO: 4.3.2               |
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| 2007212 | 4.3.3   |
|         | 4.3.3   |

| 2809214 | 2009, DS-7097 - 28-Day Repeated Dose Oral Toxicity Study in Mice, DACO:     |
|---------|---|
|         | 4.3.3   |
| 2809220 | 2016, TZ-5 - 28-Day Repeated Dose Oral Toxicity Study in Rats, DACO: 4.3.3  |
| 2809223 | 2012, NF-171: A 28-DAY Dietary Toxicity Study in Beagle Dogs, DACO: 4.3.3   |
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| 2007220 | Rodents, DACO: 4.3.4  |
| 2809226 | 2016, Picarbutrazox: Toxicity Study by Dermal Administration to Sprague-    |
| 2009220 |   |
| 2000220 | Dawley Rats for 4 Weeks, DACO: 4.3.5  |
| 2809229 | 2013, NF-171: Carcinogenicity Study by Dietary Administration to CD-1 Mice  |
|         | for 78 Weeks, DACO: 4.4.3   |
| 2809231 | 2013, NF-171: Combined Toxicity and Carcinogenicity Study by Dietary        |
|         | Administration to Sprague-Dawley Rats for 104 Weeks, DACO: 4.4.4            |
| 2809235 | 2012, Oral (Diet) Dosage-Range Reproduction Study of NF-171 in Rats, DACO:  |
|         | 4.5.1   |
| 2809237 | 2013, Two-Generation (One Litter per Generation) Reproduction Study of NF-  |
|         | 171 in Rats, DACO: 4.5.1  |
| 2809239 | 2014, NF-171: Neurotoxicity Study by a Single Oral Gavage Administration to |
|         | Sprague-Dawley Rats followed by a 14-Day Observation Period, DACO: 4.5.12   |
| 2809241 | 2016, Picarbutrazox - Waiver Request for a Subchronic (13 Week) Dietary     |
| 2007211 | Neurotoxicity Study in Rats, DACO: 4.5.13                                   |
| 2809242 | 2012, Oral (Gavage) Dosage-Range Developmental Toxicity Study of NF-171 in  |
| 2007242 | Rats, DACO: 4.5.2   |
| 2809244 | 2012, An Embryo-fetal Development Study of NF-171 by Oral (Gavage) in Rats, |
| 2009244 | DACO: 4.5.2   |
| 2000246 |   |
| 2809246 | 2011, Oral (Stomach Tube) Dosage-Range Developmental Toxicity Study of NF-  |
| 2000240 | 171 in Rabbits, DACO: 4.5.3   |
| 2809248 | 2013, An Embryo-fetal Development Study of NF-171 by Oral (Gavage) in       |
|         | Rabbits, DACO: 4.5.3  |
| 2809251 | 2009, DS-7097 - Bacterial Reverse Mutation Test, DACO: 4.5.4                |
| 2809256 | 2010, TZ-1E - Bacterial Reverse Mutation Test, DACO: 4.5.4                  |
| 2809259 | 2013, Bacterial Reverse Mutation Test of TZ-2, DACO: 4.5.4                  |
| 2809262 | 2013, Bacterial Reverse Mutation Test of TZ-2E, DACO: 4.5.4                 |
| 2809268 | 2013, Bacterial Reverse Mutation Test of TY-2, DACO: 4.5.4                  |
| 2809272 | 2010, TZ-4 - Bacterial Reverse Mutation Test, DACO: 4.5.4                   |
| 2809275 | 2010, TZ-5 - Bacterial Reverse Mutation Test, DACO: 4.5.4                   |
| 2809280 | 2013, Bacterial Reverse Mutation Test of BPOH-NF-171, DACO: 4.5.4           |
| 2809283 | 2013, Bacterial Reverse Mutation Test of Me-NF-171, DACO: 4.5.4             |
| 2809289 | 2017, NF-171: In Vitro Mutation Test Using Mouse Lymphoma L5178Y Cells,     |
| 2007207 | DACO: 4.5.5   |
| 2809297 | 2012, NF-171 - Chromosome Aberration Test in Cultured Mammalian Cells       |
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