

Evaluation Report for Category C, Subcategory 3.1, 3.10 Application

Application Number:	2008-1039
Application:	New or Changes to Product Labels-Application Rate Decrease,
	New or Changes to Product Labels-Tank Mixes
Product:	Caption CT
Registration Number:	26987
Active ingredients (a.i.):	Captan fungicide, thiophanate-methyl fungicide
PMRA Document Number: 1717058	

Background

Caption CT seed treatment contains two fungicide active ingredients, captan and thiophanate methyl. The product was originally registered in 2001, and it is fully registered for use on dry common beans (control of seedling blight and root rot, anthracnose) and on sweet corn (control of seed-borne *Penicillium* spp.). There are no tank mixes registered on the product label.

Purpose of Application

The purpose of this Category C application is to make the following changes to the product directions for use, and label wording:

(a) To register a half rate (0.5x rate) for use on dry common beans with a low infestation level of seed-borne Anthracnose (however for seeds that are moderately and highly infected, the currently registered rate should be used).

(b) To add a fungicide and insecticide tank mix claim (Apron Maxx RTA + Cruiser 5 FS) for control of diseases / insects not currently listed on the Caption CT product label, when using the proposed $\frac{1}{2}$ rate.

(c) To change the use directions with respect to the duration that treated seed can be stored before planting (increase from one month to three months).

(d) To add a standard, precautionary statement to the label regarding the use of the product with scarred or damaged seed.



Chemistry Assessment

Not required as there was no change to the product chemistry.

Health Assessments

Not required as there was no change to the product use that would impact health or residues.

Environmental Assessment

Not required as there was no change to the product use that would impact the environment.

Value Assessment

1. Addition of a half rate (0.5x rate)to the product label for use on dry common beans with a low infestation level of seed-borne Anthracnose

The product label states that it is the thiophanate-methyl that is active against anthracnose. However, reducing the product rate by half to achieve a lower rate of thiophanate-methyl for control of low-level infections of anthracnose will also have an impact on the other active, captan. No rationale or efficacy data was submitted to determine what this impact would be. Other seed treatment products containing captan are not registered at rates that would be comparable to what the ½ rate result in. Therefore, based on a label comparison of other products registered for the same claims, there is no evidence that reducing the rate to control light anthracnose infection will result in a high enough rate for the captan to control the other disease claims. The value (benefit) of reducing the rate for just low-level infection rates for one disease (anthracnose) at the possible cost of controlling the remaining labelled pests was not supported.

2. To add a fungicide and insecticide tank mix claim (Apron Max RTA + Cruiser 5 FS)

No data on the tank mix partners was submitted to support this claim. In addition, Apron Maxx is already registered for control of anthracnose and seedling blight caused by various pathogens. Therefore, the value (benefit) of adding Caption CT at the ½ rate to this tank mix, over just applying the tank mix alone, was not supported.

3. To change the duration that treated seed can be stored before planting (increase from one month to three months)

No data was submitted to verify the change to this label claim, therefore it was not supported.

4. To add a standard, precautionary statement to the label regarding the use of the product with scarred or damaged seed.

Precautionary wording similar to the proposed statement below appears on many seed treatment labels, and therefore, the addition of the statement to the Caption CT label was supported.

"Caption CT may be applied as a water-based slurry through standard slurry or commercial seed treating equipment. Treatment of mechanically scarred or damaged seed, or of seed known to be of low germ, low vigour and poor quality may result in reduced germination and/or reduction of seed and seedling vigour. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected seed treatment."

Conclusion

- Based on lack of value evidence, the reduction in product rate for control of low-level anthracnose infections in beans was not supported.
- Based on a lack of value and efficacy data, the proposed tank mix claim was not supported.
- Based on a lack of efficacy data the change to the duration of treated seeds from one month to three months was not supported.
- The addition of cautionary wording was supported.
- Minor label changes were recommended, including updating the fungicide group code from M^2 to M^4 .

References

N/A

ISSN: 1911-8082

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