

**Ferbam: Voluntary Cancellation of Several Uses, Reply by July 6, 2004**

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To: Rick Melnicoe  
Director, Western Integrated Pest Management Center

From: [Kent L. Smith](#), Ph.D.  
Plant Pathologist  
Office of Pest Management Policy (OPMP)  
Agricultural Research Service (ARS)  
United States Department of Agriculture (USDA)

Subject: Ferbam: Voluntary Cancellation of Several Uses

Hi, everyone,

Ferbam is just beginning a regulatory review. The registrant, Taminco, has indicated that they will not support several uses that are currently registered. I have attached a detailed summary of the uses and rates that will be supported and the specific uses being lost. However, in summary, here are the basic uses affected.

[Ferbam screening levels table](#) (Word document)  
[Ferbam use profile](#) (Word document)

Supported uses are:  
Cranberries, citrus, mangos (24c), nectarines, and peaches.

Unsupported uses are:  
Apples, caneberries (24c), cherries, grapes, forestry uses (plant beds and conifers), ornamentals, pears, and tobacco.

Several of these unsupported uses are hardly used which is undoubtedly why Taminco is unwilling to pay for the residue trials that will support continued use. According to usage data obtained by EPA, current usage on most crops is minimal as indicated in the second attachment.

If any of these disappearing uses are important to you, please contact me. We may be able to save needed uses. If possible, tell me:

1. the crop and disease affected, and
2. the state or region affected, and
3. the use pattern needed: rate, number of applications, application method, and timing, and
4. alternative disease management tools, and
5. why ferbam is needed (only efficacious control, effective IPM material, broad spectrum control, etc.).

Thanks for your help. If you want to comment on any of the affected uses, please respond by **July 6**. I will be contacting certain commodity groups directly. If you receive any duplicates of this request, please ignore them.

[Kent L. Smith](#), Ph.D.  
Plant Pathologist

Office of Pest Management Policy (OPMP)  
Agricultural Research Service (ARS)  
United States Department of Agriculture (USDA)  
1400 Independence Ave, SW  
Room 3859, South Ag Building  
Washington, DC 20250-0315  
Phone: 202-720-3186  
Fax: 202-720-3191  
[Web site](#)

## ATTACHMENT B:

### Ferbam

The tables below contain “screening level” usage data for agricultural crops. This information is retrieved from our principal agricultural pesticide usage databases. At the present time data from 1998 to 2002 is being used.

All numbers reported are rounded.

'<500' indicates less than 500 pounds of active ingredient.

'<2.5' indicates less than 2.5 percent of crop is treated.

Maximum percent of crop treated is the highest **observed** percent crop treated during this time period. For some crops there may have been only one or two observations and it is quite possible that if usage information had been available for more years that higher usage might have been observed. This situation is more likely to occur with low acreage crops.

'(CA only)' indicates information was available only for California. California requires reporting of all agricultural pesticide use. Their database may indicate small amounts of usage of a pesticide on crops on which the pesticide is not registered. Possible reasons for this include:

- This use may actually have occurred either as an unregistered use or as an experimental or other use in which the crop was not intended for consumption.
- Data input errors may have occurred and either the crop or the pesticide is incorrect in the database.

Use of the chemical on crops for which only California use is reported may possibly have occurred in other states.

In some cases the percent crop treated column is blank. This is because information on acres grown was not readily available.

Some of the numbers may be based on information that does not cover all 50 states. Therefore, it is possible that if the remaining (usually minor states for the crop) had been included that pounds of active ingredient would be slightly higher.

Arthur Grube 308-8095

Last revised Feb 06, 2004

Screening Level Estimates of Agricultural Uses of Ferbam  
Sorted Alphabetically

Observ	Crop	Lbs AI	Percent Crop Treated	
			Ave	Max
1	Apples	3,000	<1	<2.5
2	Cherries	9,000	<1	5
3	Grapefruit	50,000	<1	5
4	Grapes	7,000	<1	<2.5
5	Nectarines (CA only)	<500		
6	Oranges	60,000	<1	5
7	Peaches	8,000	<1	5
8	Pears	2,000		
9	Raspberries	1,000	5	5
10	Tangerines	8,000	10	10
11	Tobacco	2,000	<1	<2.5

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All numbers rounded.

'<500' indicates less than 500 pounds of active ingredient.

'<2.5' indicates less than 2.5 percent of crop is treated.

'(CA only)' indicates information was available only for California.

Use of Ferbam on this crop may also have occurred in other states.

( slua0001.sas Ferbam )

**Table 1. Ferbam Use Profile Summary**

Crop	Maximum Rate ai/Acre/App. (lbs)	Maximum # App./Season	Minimum App. Interval (Days)	Maximum Rate ai/Acre/Season
Apples	Not supported			
Cherries	Not supported			
Citrus	11.4	3	14-21	34.2
Rough Lemon Nursery Stock	19.8	2	21	39.6
Cranberries	4.56	4	14	18.3
Grapes	Not supported			
Peaches and Nectarines (Dormant use only)	3.42	2 (one in the Fall and one in the Spring)	120	6.84
Pears	Not supported			
Tobacco (plant beds)	Not supported			
Pine Seedling & Plant Beds	Not supported			
Slash & Long Leaf Pines	Not supported			
Nursery Conifer & Seedling Crops	Not supported			
Spruce	Not supported			
Douglas Fir Christmas Tree	Not supported			
Shasta Fir Christmas Tree	Not supported			
Conifers	Not supported			
Asters, Columbine, Begonias, Golden Glow, Cyciamens, Delphiniums, Iris, Hollyhocks, Laurel, Hydrangeas, Phlox, Morning Glory, Ivy, Geraniums, Verbene, Primrose, Zinnias, Snapdragons, Lilacs, Oriental Poppy, Palm Sweet Pea	Not supported			
Azaleas	Not supported			
Cacti and Succulents	Not supported			
Camelia	Not supported			
Carnations and Chrysanthimums	Not supported			
Carnations, Phlox, Delphiniums, Roses, Geraniums, Morning Glory, Marigolds, Primrose, Snapdragons, Hollyhock	Not supported			
Carnations, Scheffleras	Not supported			
Gardenias	Not supported			
Gladiolus	Not supported			
Juniper	Not supported			
Lillies	Not supported			
Orchids	Not supported			
Ornamental Cuttings	Not supported			
Peonies, Poinsettias, Tulips	Not supported			
Roses	Not supported			
Roses Snapdragons	Not supported			