

# Soil Fumigant Cluster Assessment

## Registrant's View

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# Components for Success

- Clear scope and purpose
- Assessment of risks based on valid assumptions and good science
- Adequate time for the process
- Preservation of benefits
- Realistic conclusions

# Scope

- Human health risk assessment
- Six soil fumigants

New active ingredient  
Iodomethane

Reregistration Completed  
1,3-dichloropropene

In Reregistration  
Methyl bromide  
Metam sodium  
Chloropicrin  
Dazomet

# Rationale and Purpose

## ■ Rationale

- Similar use = similar human exposure
- Consistent assessment approach
- Equal basis for evaluation of risks and benefits

## ■ Purpose

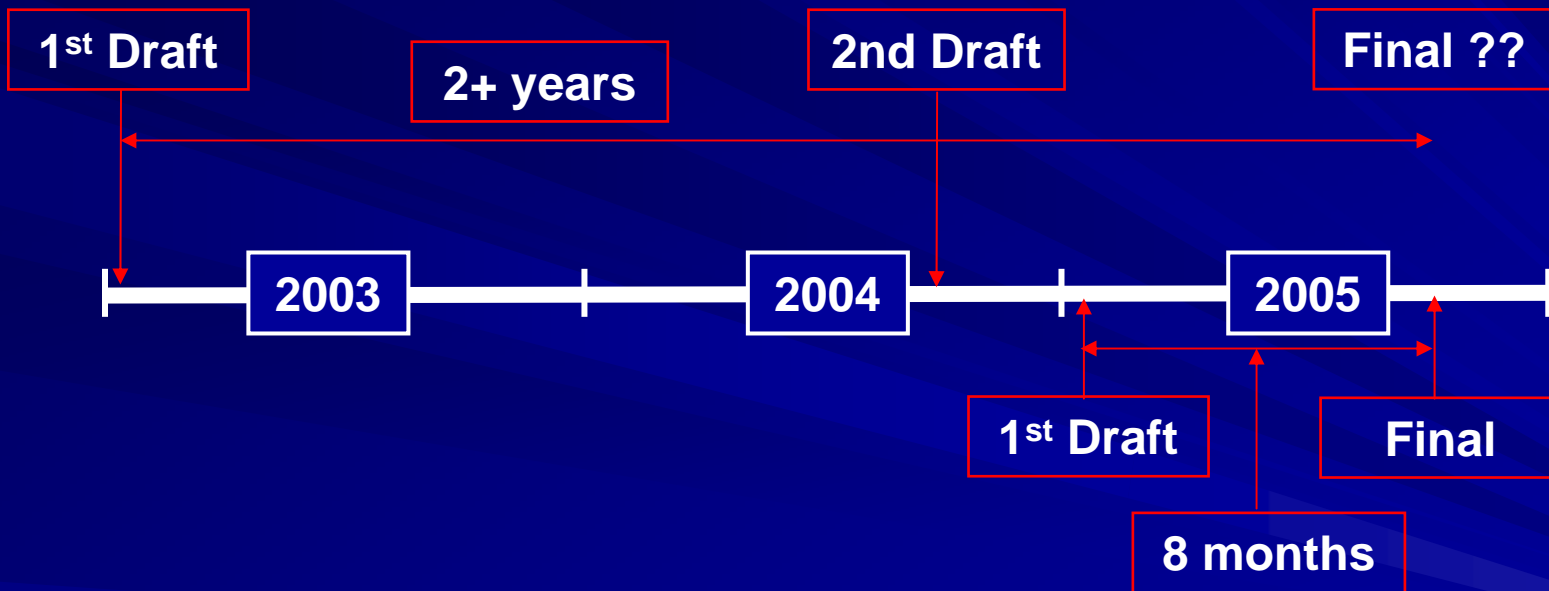
- “Address risks of concern while maintaining key benefits”

# Risk/Benefit Assessment

- Comparison of risk
  - Different routes of exposure
  - Different periods of exposure
  - Different end points
- Evaluation of benefits
  - Health and safety considerations
  - Relative efficacy
  - Consistency
  - Ease of use
  - Cost

# Allow Adequate Time

## Rodenticide Cluster Analysis – Ecological Risk



## Soil Fumigant Cluster Analysis – Health Risk

# Use Valid Assumptions

■ Health Risk = Toxicity + Exposure

■ Toxicity

- Appropriate studies
- Weight of evidence approach
- Reasonable uncertainty factors

■ Exposure

- Use reasonable, not worst-case conditions
- Deterministic vs probabilistic models

# Preservation of Benefits

- Existing fumigants are complementary
- Few new fumigants are being registered
  - Several years to replace existing products
  - CA use 2002: 32 M pounds, 290,000 acres
- Use of existing products must continue
- Extreme mitigation measures will threaten use

# Conclusion

- Reregistration may require label changes, additional mitigation, and possible additional testing
- Changes must not be so severe that use is threatened
- The process must not be unreasonably rushed.

Benefits must be preserved until  
alternatives are proven