

Pesticide Fact Sheet

Name of Chemical:

Flubendiamide

Reason for Issuance:

Conditional Registration

Date Issued:

August 1, 2008

DESCRIPTION OF CHEMICAL

Generic Name: N²-[1,1-Dimethyl-2-(methylsulfonyl)ethyl]-3-iodo-N¹-[2-methyl-

4-[1,2,2,2-tetrafluoro-1-(trifluoromethyl)ethyl]phenyl]-1,2-

benzenedicarboxamide

Common Name:

Flubendiamide

EPA Chemical Code:

027602

Chemical Abstracts

Service (CAS) Number:

272451-65-7

Pesticide Type:

Insecticide

Chemical Type:

Phthalic Acid Diamide

U.S. Producer:

Bayer CropScience LP

2 T.W. Alexander Drive

Research Triangle Park, NC 27709-2014

USE PATTERNS AND FORMULATIONS

Application Sites: Flubendiamide is registered for use on corn, cotton,

tobacco, pome and stone fruit, tree nut crops, grapes and vegetable crops (including cucurbit vegetables, fruiting vegetables and okra, leafy vegetables [except *Brassica*] and

Brassica [cole] leafy vegetables).

Types of

Formulations: NNI-0001 Technical (manufacturing concentrate)

NNI-0001 24 WG Insecticide (water dispersible granule)

NNI-0001 480 SC Insecticide (soluble concentrate)

Application Methods and Rates: Flubendiamide acts against various lepidopterous insect pests such as armyworms, bollworms, corn borers, cutworms, diamondback moths, fruitworms and loopers. Foliar spray applications can be made by aerial, ground or chemigation application on all crops as needed for insect control. Single application rates range from 0.03 to 0.16 lb. a.i./A and can be applied 3-5 times per season. Seasonal application rates range from 0.09 to 0.47 lb. a.i./A. Pre-harvest intervals (PHIs) range from 1 to 28 days. The proposed reentry interval (REI) is 12 hours on both labels. NNI-0001 24 WG Insecticide is a 24% a.i. water dispersible granule. NNI-0001 480 SC Insecticide is a 39% a.i. soluble concentrate.

HUMAN HEALTH RISK ASSESSMENT

Hazard and risk assessments were conducted in relation to this registration application and tolerance petition for the use of flubendiamide on corn, cotton, tobacco, tree fruit, tree nuts, vine crops and vegetable crops and suggest that its use, consistent with the proposed labeling measures, will be protective of the public health and the environment.

Acute Toxicity: Flubendiamide has a low order of acute toxicity via the oral, dermal and inhalation routes (Category III). Though it is a slight irritant to the eye, flubendiamide is not a skin irritant and it is not a skin sensitizer. The acute toxicity findings for flubendiamide are summarized below:

Acute Oral Toxicity: III
Acute Dermal Toxicity: III

Acute Inhalation: III
Primary Eye Irritation: IV
Primary Dermal Irritation: IV
Dermal Sensitization: Negative

Other Toxicity: In the longer-term studies in the flubendiamide mammalian toxicology database, the primary target organs identified were the liver, thyroid, kidney and eyes. Liver effects reported in rats, mice and/or dogs include organ

weight increase, periportal fatty change, hypertrophy, and minimal foci of cellular alteration. Thyroid effects include organ weight increase, follicular cell hypertrophy and slight perturbations of triiodothyronine (T3) and thyroid stimulating hormone (TSH) in the rat and mouse. Kidney effects include increases in absolute and/or relative to body kidney weights and chronic nephropathy in the rat. Eye effects include eye enlargement, opacity, and exophthalmus with hemorrhage and appear only in rat pups. Other changes include mild microcytic anemia, decreased serum triglycerides and cholesterol in female rat, increased gamma glutamyl peptidase, alkaline phosphatase and shortened activated prothrombin time in dogs and adrenal weight increase and increase in adrenal cortical cell hypertrophy in dogs.

The hazard assessment indicated potential toxicity resulting from exposure to flubendiamide via different routes over different durations. The observed eye effects were selected as a critical effect for the acute dietary exposure scenario; whereas liver and thyroid effects were determined critical for the chronic dietary exposure scenario. Short- and intermediate-term dermal risks were also based on liver and thyroid effects, as well as blood effects. Short- and intermediate-term inhalation risks are based on liver toxicity, as well as adrenal weight increase and an increase in adrenal cortical cell hypertrophy.

Metabolism: Rat metabolism studies at low and high doses report fairly rapid absorption, with peak blood and plasma levels reached at approximately 6 to 12 hours post-dosing followed by a continuous decline. The NNI-0001 was fairly well distributed among blood and most of the organs and tissues, with some preference to the liver, adrenal glands, and fat. Generally, the liver and kidneys contained the greatest percentage of the administered dose. Excretion of NNI-0001 residues was rapid (majority of radioactivity recovered at the first 24-hour collection point), with feces being the predominant route of excretion. Renal excretion accounted for only 2% and <1% of the dose in male and female rats, respectively. Parent NNI-0001, NNI-0001-benzylalcohol (A-16) and NNI-0001-benzoic acid (A-18) were the major residues identified in the feces. Additionally, metabolite A-14 was identified in the fat of female rats at 1% of the administered dose.

In vitro metabolism and toxicokinetic studies in multiple mammalian species appear to confirm the findings reported in the *in vivo* rat metabolism study, that female rats appear to metabolize the parent compound differently from male rats and other species. Female rats do not show an ability to convert the parent compound to the metabolite A-16 due to the lack of β -NADPH that is required for metabolism, indicating there was no abiotic degradation of the test compound in the test systems. The lack of abiotic degradation and the longer terminal elimination half-life of the parent compound in the female rats, differentiate them from other test animals.

Endpoints

Acute: The 2-generation reproduction, 1-generation reproduction and DNT studies, as 3 co-critical studies, were selected for the acute reference dose (aRfD) of 0.995

mg/kg/day using 99.5 mg/kg/day from the DNT study (the highest NOAEL) and a LOAEL from the 1-generation reproduction study of 127 mg/kg/day (the lowest LOAEL) based on buphthalmia (enlargement of eyes), ocular opacity, retinal degeneration, hemorrhage, cataract and atrophy of the optic nerve. The NOAEL/LOAEL chosen result in a more refined yet health protective acute dietary risk assessment.

The weight of evidence from various studies suggest that the finding of enlarged eyeballs in rat offspring is a rat-specific phenomenon, resulting from exposure to higher steady-state concentrations of flubendiamide which may be due to the uniquely diminished capacity of the female rat to oxidize the parent compound. While human microsomes have been shown to be capable of approximately 4 times higher hydroxylation rates than female mouse microsomes and may be able to efficiently metabolize/excrete flubendiamide, preventing accumulation of the parent compound, it remains unclear whether this ability is the only requirement to avoid ocular toxicity. Due to the potential concern for increased susceptibility of human neonates vs. adults, this perinatal ocular effect is considered in the HED risk assessment.

Chronic: The 1-year chronic rat study, 1-year chronic dog study and the 24-month rat carcinogenicity study were selected as 3 co-critical studies for the chronic reference dose (cRfD) of 0.024 mg/kg/day with a NOAEL/LOAEL of 2.4/33.9 mg/kg/day (highest NOAEL of 2.4 mg/kg/day from 1-year chronic rat study and lowest LOAEL of 33.9 mg/kg/day from 24-month rat study. Although the 1-year dog study had NOAELs of 2.21/2.51 mg/kg/day, the lowest NOAELs from each study were considered when comparing NOAELs among the 3 studies, respectively, based on the consistent liver toxicity reported across multiple studies, different durations and multiple species. The NOAEL/LOAEL chosen are protective of effects seen in other long-term studies.

Carcinogenicity: Flubendiamide is considered to be "Not Likely to be Carcinogenic to Humans." There was no evidence of carcinogenicity in rats and mice up to the limit dose at 24- and 18-months, respectively. Flubendiamide was determined to be non-mutagenic in bacteria, negative in an *in vivo* mammalian cytogenetics assay and did not cause unscheduled DNA synthesis (repair of DNA damage) in mammalian cells *in vitro*. Overall, there was no clear evidence that flubendiamide was either mutagenic or clastogenic in either *in vivo* or *in vitro* assays. Quantification of cancer risk is; therefore, not needed for flubendiamide.

FQPA Safety Factor: EPA evaluated the quality of the toxicity/exposure data and has determined that the safety of infants and children would be adequately protected if the FQPA safety factor (SF) were reduced to 1x based on the following findings: (1) The toxicology database for flubendiamide is complete for purposes of risk assessment and the characterization of potential pre- and/or post-natal risks to infants and children. Although susceptibility was identified in the toxicological database (eye effects), the selected regulatory PODs (which are based on clear NOAELs) are protective of these effects; therefore, the human health risk assessment is protective;

(2) There are no treatment-related neurotoxic findings in the acute neurotoxicity and DNT studies in rats. Although eye effects were observed in the DNT study, the PODs employed in the HED risk assessment are protective of this effect; and (3) There are no residual uncertainties identified in the exposure databases and the exposure assessment is protective.

Dietary Exposure

Acute Risk: The acute dietary analysis assumed that 100% of crops with requested uses of flubendiamide are treated and that all treated crops contain residues at tolerance-level. In addition, tolerance-level residues for livestock commodities were included in these analyses to account for the potential transfer of plant residues to livestock tissues. Modeled estimates of drinking water concentrations were directly entered into the dietary exposure model. For acute dietary risk assessment, the water concentration value of 12.93 ppb was used to assess the contribution to drinking water. These assumptions result in conservative, health-protective estimates of exposure which are well below the Agency's LOC (100% of the aPAD). The maximum exposure estimate is less than 8% of the aPAD for the most highly exposed population subgroup, children 1-2 years old. These analyses indicate that there are no acute dietary exposure considerations that would preclude registration of flubendiamide for the requested uses.

Chronic Risk: The chronic dietary analysis assumed that 100% of requested crops are treated and that all treated crops contain residues at the average residue levels found in the crop field trials and experimentally-determined processing factors where available. In addition, average-level residues for livestock commodities were also included in these analyses to account for the potential transfer of plant residues to livestock tissues. Modeled estimates of drinking water concentrations were directly entered into the dietary exposure model. For chronic dietary risk assessment, the water concentration value of 11.95 ppb was used to assess the contribution to drinking water. These assumptions result in conservative, health-protective estimates of exposure which are well below the Agency's LOC (100% of the cPAD). The maximum exposure estimate is less than 15% of the cPAD the most highly exposed population subgroup, children 1-2 years old. These analyses indicate that there are no chronic dietary exposure considerations that would preclude registration of flubendiamide for the requested uses.

Aggregate Risk: The aggregate risk assessment considers dietary exposures from food and drinking water to flubendiamide consumed over the acute and chronic durations. Acute and chronic dietary exposure is well below the Agency's LOC and there are no acute or chronic dietary exposure considerations that would preclude registration of flubendiamide for the requested uses.

Residue Chemistry: The nature of the residue in plants, rotational crops and ruminants is adequately understood. For the purposes of tolerance establishment and

dietary/drinking water risk assessment, the residue of concern in plants, animals and rotational crops is the parent flubendiamide *per se*.

Tolerances have been established in 40 CFR §180.639 in or on the following food commodities: almond, hulls (9.0 ppm); apple, wet pomace (2.0 ppm); brassica, head and stem, subgroup 5A (0.60 ppm); brassica, leafy greens, subgroup 5B (5.0 ppm); cattle, fat (0.30 ppm); cattle, kidney (0.30 ppm); cattle, liver (0.30 ppm); cattle, muscle (0.05 ppm); corn, field, forage (8.0 ppm); corn, field, grain (0.02 ppm); corn, field, stover (15 ppm); corn, pop, grain (0.02 ppm); corn, pop, stover (15 ppm); corn, sweet, forage (9.0 ppm); corn, sweet, kernel plus cob with husks removed (0.01 ppm); corn, sweet, stover (25 ppm); cotton gin byproducts (60 ppm); cotton, undelinted seed (0.90 ppm); egg (0.01 ppm); fruit, pome, group 11 (0.70 ppm); fruit, stone, group 12 (1.6 ppm); goat, fat (0.30 ppm); goat, kidney (0.30 ppm); goat, liver (0.30 ppm); goat, muscle (0.05 ppm); grain, aspirated fractions (5.0 ppm); grape (1.4 ppm); horse, fat (0.30 ppm); horse, kidney (0.30 ppm); horse, liver (0.30 ppm); horse, muscle (0.05 ppm); milk (0.04 ppm); milk, fat (0.30 ppm); nut, tree, group 14 (0.06 ppm); okra (0.30 ppm); poultry, fat (0.02 ppm); poultry, liver (0.01 ppm); poultry, muscle (0.01 ppm); sheep, fat (0.30 ppm); sheep, kidney (0.30 ppm); sheep, liver (0.30 ppm); sheep, muscle (0.05 ppm); vegetable, cucurbit, group 9 (0.20 ppm); vegetable, fruiting, group 8 (0.60 ppm) and vegetable, leafy, except brassica, group 4 (11 ppm); and in or on the following raw agricultural commodities: alfalfa, forage (0.15 ppm); alfalfa, hay (0.04 ppm); barley, hay (0.04 ppm); barley, straw (0.07 ppm); buckwheat (0.07 ppm); clover, forage (0.15 ppm); clover, hay (0.04 ppm); grass, forage (0.15 ppm); grass, hay (0.04 ppm); millet, pearl, forage (0.15 ppm); millet, pearl, hay (0.04 ppm); millet, proso, forage (0.15 ppm); millet, proso, hay (0.04 ppm); millet, proso, straw (0.07 ppm); oats, forage (0.15 ppm); oats, hay (0.04 ppm); oats, straw (0.07 ppm); rye, forage (0.15 ppm); rye, straw (0.07 ppm); sorghum, grain, forage (0.03 ppm); sorghum, grain, stover (0.06 ppm); soybean, forage (0.02 ppm); soybean, hay (0.04 ppm); teosinte, forage (0.15 ppm); teosinte, hay (0.04 ppm); teosinte, straw (0.07 ppm); triticale, forage (0.15 ppm); triticale, hay (0.04 ppm); triticale, straw (0.07 ppm); wheat, forage (0.15 ppm); wheat, hay (0.03 ppm) and wheat, straw (0.03 ppm).

At this time, there are currently no established CODEX, Canadian or Mexican MRLs established for residues of flubendiamide *per se* in crop or livestock commodities.

Occupational: No chemical-specific data for assessing human exposures during pesticide handling activities were submitted in support of the registration of flubendiamide. EPA used surrogate data from the PHED Version 1.1 (PHED Surrogate Exposure Guide, August 1998) to assess exposures. The level of concern is a Margin of Exposure (MOE) of less than 100. All occupational handler MOEs for flubendiamide are estimated to be greater than 100 at some level of risk mitigation for the proposed uses. Combined dermal plus inhalation risks are not a concern, provided that: (1) Baseline attire (long-sleeved shirt and long pants and shoes plus socks) is worn by all occupational handlers; (2) Handlers mixing and loading liquid concentrates to support aerial and chemigation applications wear

chemical-resistant gloves such as barrier laminate, butyl rubber, nitrile rubber or viton; and (3) Pilots use enclosed cockpits.

There is the possibility for agricultural workers to have post-application exposure to flubendiamide following its proposed agricultural crop uses. Therefore, occupational post-application exposures and risks were assessed using data from flubendiamide-specific DFR studies and using EPA's default assumptions that 20% of the initial application is available for transfer on day 0 (i.e., 12 hours after application) and that the residue dissipates at a rate of 10% per day following treatment.

For flubendiamide, the exposure durations for non-cancer post-application risk assessment were short- (1 to 30 days) and intermediate-term (>30 days and up to several months). However, since the dermal toxicological endpoint of concern is the same for short- and intermediate-term exposures, the short- and intermediate-term post-application risks are numerically identical. Inhalation exposures are thought to be negligible in outdoor post-application scenarios, since flubendiamide has a relatively low vapor pressure $(7.5 \times 10^{-7} \text{ mm Hg})$.

It should be noted that the grape and corn flubendiamide-specific DFR data indicate that flubendiamide does not dissipate characteristically in a steady state. Rather, there is evident fluctuation up and then down, though the ultimate trend is downwards. In fact, the highest residue value detected in the entire study was detected on corn on the 2^{nd} day after the last treatment. That observation (0.390 $\mu g/cm^2$) is higher than the residue value calculated for corn using EPA default assumptions (0.21 $\mu g/cm^2$) by a factor of 1.86 (0.390/0.21 = 1.86). To ensure that the post-application assessments, using default DFRs are protective, EPA conducted a highly conservative assessment assuming that all the default DFRs would be 1.86x higher if flubendiamide-specific data were generated on each of those crops (an assumption that is not likely, since in the case of grapes, the DFR residues were less than the default assumptions). Therefore, even when assuming an extraordinarily worse-case scenario, post-application exposure to flubendiamide does not pose a risk to occupational workers.

Flubendiamide is classified in acute toxicity category III for acute dermal toxicity and category IV for primary eye irritation and primary skin irritation. It is not a dermal sensitizer. A restricted entry interval (REI) of 12 hours is appropriate and meets the requirements of the Worker Protection Standard for Agricultural Pesticides (WPS).

ENVIRONMENTAL RISK ASSESSMENT

Ecological Effects

The Agency has determined, based on the proposed uses, that there is no potential risk to freshwater and marine fish, marine crustaceans, marine mollusks and aquatic plants at the limit of solubility for parent flubendiamide. In addition, there is no

potential acute risk or reproductive effects to birds and mammals, earthworms, beneficial insects including honey bees and natural Lepidoptera predators, and terrestrial plants for all of the proposed uses.

There is a potential risk to freshwater benthic invertebrates exposed to flubendiamide and its degradate des-iodo. EPA has compared the body of toxicological data for the parent compound and des-iodo. With the possible exception of chronic testing with chironomid midges, there is no apparent difference in toxicity evident from the available data. In the case of the chironomid data, conversion of effect endpoints to pore water units results in an estimated NOAEC for the parent compound of approximately 1 µg/L. The corresponding NOAEC for des-iodo is 0.28 µg/L. Because of the estimated nature of the parent compound NOAEC (the value is estimated from the relationship between nominal and pore water measurements at other dose levels because actual measurements of pore water concentrations were not made at the NOAEC level) and because NOAEC comparisons are usually confounded by the dose selections at study design onset, EPA concluded that there was insufficient data to demonstrate a significant difference in toxicity between the parent and degradate. However, for the purposes of risk assessment and in consideration of the use of data as prescribed in the Agency's Risk Assessment Overview Document, risk calculations are based on the chronic endpoints established for each chemical, specifically.

Using these NOAEC values, RQs for parent flubendiamide would range from 0.94 to 21.3. Considering only the accumulation within the first 30 years of use for all of the crop scenarios, RQs for the des-iodo degradate would range from 0.03 to 6.9 in the 1st year, 2.9 to 64 in the 10th year, 4.9 to 127 in the 20th year and 12 to 190 in the 30th year. Uncertainties in the model results make longer term estimates of accumulation and risk unreliable. However, due to the persistence of both the parent and degradate, there is a concern for potential accumulation in aquatic sediments over time.

Testing of the formulated products 480 SC and 24 WG resulted in RQs ranging up to 0.1 for freshwater invertebrates. Results of a mesocosm study conducted with the formulated products also did not identify any serious risk concerns for water column invertebrates.

Adult ladybird beetles are potentially at risk due to ingestion of food items (aphids and pollen) containing flubendiamide residues. In addition, there is a potential direct risk to non-target lepidopterous species, including endangered species. Lepidoptera may occur in areas adjacent to treated fields, where they may be exposed to spray drift, and will likely move through treated fields. Further, the larvae of some lepidopterous species are aquatic and; therefore, may be exposed to both the parent formulation and the des-iodo degradate.

The Agency is concerned about the possible accumulation of flubendiamide and desiodo in aquatic sediments and the effects that this would have on freshwater benthic organisms. However, given the benefits described below, the Agency is granting

registration for this chemical at this time. The risk mitigation required and conditions of registration for this chemical, as described below, are designed to address these concerns and to provide adequate information that will allow the Agency to determine: (1) if the required risk mitigation is adequate or, if this is still uncertain; and (2) through a monitoring program, determine the rate and extent of accumulation of the parent and degradate in the most vulnerable areas of use during the time period of the 5-year conditional registration.

Environmental Fate and Transport

Hydrolysis/Photolysis: Flubendiamide is stable to hydrolysis under laboratory conditions, but direct aqueous photolysis appears to be a main route of degradation. Flubendiamide degrades to NNI-0001-des-iodo (des-iodo), with a half-life estimated as 11.56 days. Flubendiamide degrades to des-iodo under laboratory soil photolysis with a half-life estimated as 35.3 days. Volatilization from soil and water surfaces is not expected to be an important dissipation route since flubendiamide has a relatively low vapor pressure (7.5 x 10⁻⁷ mm Hg) and Henry's Law constant (8.9 x 10⁻¹¹ atm·m³/mol).

Mobility/Transport: Flubendiamide is expected to be slightly to hardly mobile ($K_{FOC} = 1,076$ to 3,318 L/Kg). Des-iodo is expected to be moderately mobile ($K_{FOC} = 234$ to 581 L/kg). The main transformation product, des-iodo, is more mobile than the parent; however, des-iodo was only detected in a small quantity (<3.4% of the applied) at the 0 to 15 cm soil depth at 3 sites in the terrestrial field studies. Flubendiamide and des-iodo have the potential to contaminate surface water through run-off due to their persistence in soil and also have the potential for groundwater contamination in vulnerable soils with low organic carbon content, after heavy rainfall and/or in areas with high water tables (because there is less depth to travel before reaching groundwater).

Soil/Water Degradation: Flubendiamide is stable under aerobic and anaerobic soil metabolism and aerobic aquatic metabolism laboratory conditions. In aerobic and anaerobic aqueous environments, flubendiamide is expected to dissipate somewhat faster than in aerobic soil, likely as a result of metabolism. Laboratory experiments using anaerobic and aerobic aquatic systems resulted in flubendiamide half-lives (water plus soil/sediment) of 127 to 364 days and 32.8 to 533.2 days, respectively. Anaerobic aquatic metabolism is another main route of degradation for flubendiamide. Flubendiamide degrades to des-iodo under anaerobic aquatic conditions with a half-life estimated as 365 days. Flubendiamide and des-iodo's overall stability/persistence suggests that they will accumulate in soils, water column and sediments with each successive application.

<u>Terrestrial Field Dissipation</u>: Flubendiamide also degrades in the field condition very slowly. In terrestrial field experiments, flubendiamide half-lives in 3 soils ranging from loamy sand to silt loam were 210 to 770.2 days (leaching to a depth of 30 to 60 cm) and in a sandy loam soil under outdoor conditions, the half-life was 322 days. In an aerobic soil environment, flubendiamide is expected to dissipate slowly. In the

laboratory using 4 soils ranging from loamy sand to silt, flubendiamide was stable with <5% of the applied chemical dissipating at 371 days post-treatment.

REGULATORY DECISION

Conditional Registration: A 5-year conditional registration has been granted for flubendiamide use as an insecticidal control of various lepidopterous insect pests on corn, cotton, tobacco, tree fruit, tree nuts, vine crops and vegetable crops.

Flubendiamide may be a viable alternative to comparably registered and existing pesticides that tend to pose greater risk concerns and may also be an important tool as a rotational insecticide to limit or prevent the development of resistance to other insecticide chemistries. Flubendiamide has also been identified as an OP alternative for the control for the control of leafroller and fruitworm pests in tree fruit production, where the dominant pesticides used have been azinphos-methyl, chlorpyrifos and phosmet.

The EFED risk assessment; however, suggests that both flubendiamide and des-iodo will accumulate to concentrations in aquatic environments that will pose risk to freshwater benthic invertebrates. As a result, EPA is requiring certain measures which the Agency believes may be effective in mitigating the apparent risk, including the requirement 15-foot vegetative buffer zones which are expected to reduce run-off of both parent and degradate to the aquatic environment, reduced application rates and other labeling statements which reduce the allowable total loading in one year and environmental hazards, ground water and surface water advisories.

To confirm the utility of the 15-foot vegetative buffers, the Agency is requiring a small-scale run-off/vegetative buffer strip study. If the utility of the 15-foot buffers cannot be demonstrated to achieve reductions in off-site transport and aquatic organism risk that would alleviate the risk concern, the Agency is requiring a monitoring program, the results of which allow the Agency to determine, at the end of the 5-year conditional registration, the rate and extent of accumulation in the most vulnerable use areas. If there are risk concerns at that time that result in the Agency being unable to determine that there are no reasonable adverse effects to the environment, the registrants have agreed that the pesticide will be voluntarily cancelled.

Conditional Data: The registrant has committed to submit the following data:

1. Flubendiamide

• (Non-guideline) Small-Scale Runoff/Vegetative Buffer Strip Study – The quantitative efficacy of vegetative buffers for flubendiamide use is uncertain. To determine the magnitude of the parent, flubendiamide, retained in buffer strips, the small-scale run-off/vegetative buffer strip study and monitoring program will allow the Agency to quantitatively consider the impact of such buffers on the risk picture. The protocols for the studies will be mindful of the

need to both consider the variety of proposed use sites as well as a variety of buffer conditions.

If the employment of label enforceable buffers is empirically demonstrated to alleviate the risk concern, then no further work need be conducted. However, if buffers cannot be demonstrated to achieve these meaningful risk reductions, the other areas of critical uncertainty in the modeling assumptions must be considered. In this case, there is considerable uncertainty in the application of the EXAMS pond scenario for chemicals with suspected aquatic system accumulation. Additional information on the actual potential for the pesticide to build up in receiving waters would address the uncertainty associated with current model limitations. Therefore, a monitoring study of receiving waters within watersheds where flubendiamide will be used will be required.

2. Des-iodo Degradate

- (161-1) **Hydrolysis** A hydrolysis study to establish the significance of chemical hydrolysis as a route of degradation for des-iodo and to identify, if possible, the hydrolytic products formed to provide initial information on whether they may exhibit structures that may potentially adversely affect nontarget organisms.
- (162-4) **Aerobic Aquatic Metabolism** An aerobic aquatic metabolism study to determine the effects of des-iodo on aerobic conditions in water and sediments during the period of dispersal of des-iodo throughout the aquatic environment and to compare rates and formation of metabolites. The data from this study would provide the aerobic aquatic input parameter for PRZM/EXAMS; therefore, potentially reducing modeling uncertainty.
- 3. For the submitted GLN 860.1850 Confined Rotational Crop studies (MRIDs 46817133 and 46817134), the registrant will submit extraction and analysis dates of samples in order to confirm that samples were extracted and analyzed within the stated intervals (or within 6 months of harvest). Otherwise, additional storage stability data may be required by EPA.

BENEFIT DETERMINATIONS: Since flubendiamide is a novel chemistry, the Agency believes that it may be a viable alternative to comparably registered and existing pesticides that tend to pose greater risk concerns. Also, it may be an important tool as a rotational insecticide to limit or prevent the development of resistance to other insecticide chemistries. BEAD's preliminary analysis of the material submitted by the registrant concludes that flubendiamide provides Lepidoptera control equivalent or superior to the insecticides currently being used for pest control in the evaluated crops. Materials submitted also suggest low toxicity to terrestrial insect predators and honey bees which should make flubendiamide an important component in IPM programs.

When assessing recent pesticide usage data for currently registered insecticide products aimed at controlling lepidopterous pests in corn, several market leaders are of concern to

the Agency. Flubendiamide's toxicity to terrestrial organisms is low, especially in comparison to the current active ingredients most commonly used against the labeled target pests.

For pesticides used to control cotton pests such as the beet armyworm and bollworm, the usage information for products used in 2007 was more broadly distributed among chemical pesticides than that indicated for corn usage, with a number of synthetic pyrethroids, namely lambda cyhalothrin, and other chemistries such as acephate and chlorpyrifos leading the usage profile.

In addition, flubendiamide has been identified as an organophosphorus pesticide alternative for the control of leafroller and fruitworm pests in tree fruit production, where the dominant pesticides used have been azinphos-methyl, chlorpyrifos and phosmet. Therefore, flubendiamide is a chemical that broadens the diversity of pest control measures available to growers for the reasons stated above.

REQUIRED LABEL STATEMENTS

The end-use product labels containing flubendiamide as an active ingredient will be amended as follows:

- 1. Requirement of 15-foot vegetative buffer zones and the addition updated spray drift language for aerial/ground applications for similar products with similar use patterns on both end-use labels.
- 2. On the proposed label for 24 WG, the registrant will reduce application rates, revise the maximum amount of product applied per acre "per year" to a "per crop season" basis and remove the number of applications per crop season for the *Brassica*, Cucurbits, Leafy Vegetables and Fruiting Vegetables crop groupings in order to reduce the per year loading allowed.
- 3. Addition of revised environmental hazards, ground water and surface water advisories to both end-use labels.
- 4. On the proposed label for 480 SC, the registrant will be required to clearly articulate what application method(s) are proposed for each listed crop.
- 5. The proposed rotational crop restriction for root crops (root, tuber and bulb vegetables), which specifies that "treated areas may be replanted immediately following harvest, or as soon as practical following the last application" will be revised to a 30-day plant-back interval on both end-use labels.

GOVERNMENT PERFORMANCE AND RESULTS ACT (GPRA)

Registering flubendiamide will meet the objectives of GPRA title 3.1.1 by assuring new pesticides that enter the market are safe for humans and the environment.

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DISCLAIMER: The information presented in this Pesticide Fact Sheet is for informational purposes only and may not be used to fill data requirements for pesticide registration. The information is believed to be accurate as of the date on the document.

Appendix 1 -- Structure and Nomenclature

Flubendiamide Nomenclature	Flubendiamide Nomenclature.			
Chemical structure	HN SO ₂ CH ₃ CF ₃ CF ₃			
Empirical Formula	C ₂₃ H ₂₂ F ₇ IN ₂ O ₄ S			
Common name	Flubendiamide (proposed ISO name)			
Company experimental name	NNI-0001			
IUPAC name	N^2 -[1,1-Dimethyl-2-(methylsulfonyl)ethyl-3-iodo- N^1 -{2-methyl-4-[1,2,2,2-tetrafluoro-1-(trifluoromethyl)ethyl]phenyl}phthalamide			
CAS name	N^2 -[1,1-Dimethyl-2-(methylsulfonyl)ethyl-3-iodo- N^1 -[2-methyl-4-[1,2,2,2-tetrafluoro-1-(trifluoromethyl)ethyl]phenyl]-1,2-benzenedicarboxamide			
CAS registry number	272451-65-7			
End-use products (EPs)	NNI-0001 480 SC (EPA File Symbol 264-XXX) NNI-0001 24 WG (EPA File Symbol 264-XXX)			
Chemical Class	Phthalic acid diamide insecticide			
Known Impurities of Concern	None			

Appendix 2 -- Physical and Chemical Properties

Physicochemical Properties of Flub	endiamide.		
Parameter	Value		Reference
Molecular weight	682.39 g/mol		Product
Melting point/range	217.5-220.7 °C		Chemistry Review
pH	6.05 (20 °C)	The state of the s	of Flubendiamide
Density	1.659 g/mL (20 °C)		Technical.
Water solubility	29.90 μg/mL (20 °C)		
Solvent solubility	Solvent	Solubility (g/L)	
	<i>p</i> -xylene	0.488	
	n-heptane	0.000835	
	methanol	26.0	
	1,2-dichloroethane	8.12	
	acetone	102	
	ethyl acetate	29.4	
Vapor pressure	10 ⁻⁴ Pa (25°C)		
Dissociation constant, pK _a	Does not dissociate		
Octanol/water partition coefficient, $Log(K_{OW})$	4.2 (pH 5.9, 25°C)		
UV/visible absorption spectrum	204.4 nm (neutral methan	ol)	

Appendix 3 – Toxicity Profiles

	Acute Toxicity Profile – Flubendiamide				
Guideline No.	Study Type	MRID(s)	Results	Toxicity Category	
870.1100	Acute oral – rat	46817144	LD50 = >2000 mg/kg	III	
870.1200	Acute dermal- rat	46817147	LD50 = >2000 mg/kg	III	
870.1300	Acute inhalation - rat	46817150	LC50 = >0.0685 mg/L	III	
870.2400	Acute eye irritation -rabbit	46817203	Irritating (slight)	IV	
870.2500	Acute dermal irritation – rabbit	46817206	Non-irritating	IV	
870.2600	Skin sensitization – guinea pig	46817209	Negative	N/A	

Guideline No.	ronic and Other Tox Study Type	MRID No. (year)/	Results
Outdenne 110.	Study Type	Classification /Doses	Results
870.3050	28-Day Oral (rat) Not Submitted*	ppm: 0 - 20 - 50 - 200 - 2000 - 20000 mg/kg/day: M: 0 - 1.53 - 3.88 - 15.1 - 52 - 1575 F: 0 - 1.63 - 4.17 - 16.1 - 156 - 1605	NOAEL (M/F) = $15.1 / 4.17$ mg/kg/day LOAEL (M/F) = $152 / 16.1$ mg/kg/day based on: liver: \uparrow (m/f)— periportal fatty change, \uparrow wt [abs/rel (m/f)] \downarrow (f)— ALP \uparrow (f)— GPT
870.3050	28-Day Oral (mice) Not Submitted*	ppm: 0 - 20 - 200 - 2000 - 20000 mg/kg/day: M: 0 - 2.73 - 26.9 - 265 - 2678 F: 0 - 2.88 - 30.0 - 299 - 3024	NOAEL (M/F) = 26.9 / 30.0 mg/kg/day LOAEL (M/F) = 265 / 299 mg/kg/day based on: liver: \(\gamma(m/f)\)— hypertrophy (centrilobular hepatocytes);\(\gamma(m)\)—[dark-colored + fatty change (centrilobular hepatocytes)]
870.3050	28-Day oral toxicity (dog) Not Submitted*	ppm: 0 - 40 - 400 - 4,000 - 40,000 mg/kg/day: M: 0 - 1.12 - 10.7 - 101 - 1111 F: 0 - 1.10 - 12.0 - 120 - 1180	NOAEL (M/F) = 10.7 / 1.10 mg/kg/day LOAEL (M/F) = 101 / 12.0 mg/kg/day based on: \(\gamma(m/f)\)- ALP
870.3100	90-Day oral toxicity (rat)	46817210 (2003)/ Acceptable/guideline ppm: 0 - 20 - 50 - 200 - 2000 - 20000 mg/kg/day: M: 0 - 1.15 - 2.85 - 11.4 - 116 - 1192 F: 0 - 1.30 - 3.29 - 13.1 - 128 - 1320	NOAEL (F) = 13.1 mg/kg/day LOAEL (F) = 128 mg/kg/day based on: slight hepatotoxicity (†(f) – periportal fatty change, hepatocellular hypertrophy, †wt [abs/rel(f)], †GGT

	ronic and Other Tox	icity Profile	
Guideline No.	Study Type	MRID No. (year)/ Classification /Doses	Results
870.3150	90-Day oral toxicity (mouse)	46817211 (2002)/ Acceptable/guideline ppm: 0 - 50 - 100 - 1000 - 10000 mg/kg/day: M: 0 - 6.01 - 11.9 - 123 - 1214	NOAEL (M/F) = 11.9 / 14.7 mg/kg/day LOAEL (M/F) = 123 / 145 mg/kg/day based on slight hepatotoxicity: (†fatty change, hepatocellular hypertrophy, † abs/rel wt [f])
870.3150	90-Day oral	F: 0 – 7.13 – 14.7 – 145 – 1424 46817212 and 46817242	NOAEL (M/F) = 2.58 / 2.82 mg/kg/day
670.5130	toxicity (dog)	(2003)/ Acceptable/guideline ppm:	LOAEL (M/F) = 52.7 / 59.7 mg/kg/day based on clinical signs of toxicity (loose stool), shortened APTT, increased ALP and triglycerides, increased adrenal weights, and
		0-100-2000-40000 mg/kg/day: M: 0-2.58-52.7-1076 F: 0-2.82-59.7-1135	microscopic effects on the adrenal glands in females: adrenal: \(\frac{1}{3}\) - cortical hypertrophy; \(\frac{1}{3}\) - wt \(\frac{1}{3}\) - APTT \(\frac{1}{3}\) - [ALP(m/f), Triglycerides(f)]
870.3200	28/29-Day dermal toxicity (rat)	46817213 (2004)/ Acceptable/guideline mg/kg/day: 0 - 10 - 100 - 1000	NOAEL = 100 mg/kg/day (systemic); 1000 mg/kg/day (local skin) LOAEL = 1000 mg/kg/day based on: liver: \(\frac{m}{f} \)-periportal fatty change + \(\frac{t}{t} \) [abs/rel]; thyroid: \(\frac{t}{f} \)-follicular cell hypertrophy \(\frac{t}{f} - [Hct + MCV + MCH] \) \(\frac{t}{f} - AST \)
870.3700a	Prenatal developmental in (rat)	46817215 and 46817241 (2003)/ Acceptable/guideline mg/kg/day: 0 - 10 - 100 - 1000	Maternal: NOAEL = 10 mg/kg/day; LOAEL = 100mg/kg/day based on: liver: †wt[abs/rel]. Developmental: NOAEL >1000 mg/kg/day; LOAEL was not observed (>1000 mg/kg/day).
870.3700Ь	Prenatal developmental in (rabbit)	46817214 and 46817240 (2002)/ Acceptable/guideline mg/kg/day: 0 - 10 - 100 - 1000	Maternal: NOAEL = 100 mg/kg/day; LOAEL = 1000 mg/kg/day based on: food consumption decreaseon last day of treatment (GD27-28) and loose stool Developmental: NOAEL >1000 mg/kg/day; LOAEL not observed (>1000 mg/kg/day)

Guideline No.	ronic and Other Tox Study Type	MRID No. (year)/	Results
Guidenne 140.	Study Type	Classification /Doses	Results
870.3800	Two-generation	46817216 (2004)/	Parental/Systemic: NOAEL (M/F) = 3.30 /
	Reproduction and	Acceptable/guideline	3.95 mg/kg/day; LOAEL (M/F) = $131/159$
	fertility effects	ppm:	mg/kg bw/day based on: liver: †P/F1m-
	(rat)	0-20-50-2000-	[brown pigment deposition + wt (rel)]; †Pf
	()	20000	/F1f -[enlarged/dark-colored livers +
		mg/kg/day (premating	hepatocyte hypertrophy + periportal fatty
		doses):	change + brown pigment deposition + wt];
		Pm: 0 – 1.30 – 3.30 – 131	thyroid: †P/F1 –[follicular cell hypertrophy];
		-1307	\tau t (abs Pm); kidney: \tau Pf -[tubular
		Pf: 0 – 1.59 – 3.95 – 159 –	basophilic change + urinary casts]; †Pf/F1f-
		1577	wt; ovary: †Pf –interstitial cell vacuolation;
		F1m: 0 – 1.64 – 4.05 –	uterus: \tau (Pf); pituitary: \tau (F1); spleen:
		162 – 1636	there's: \\ \psi \text{(F1)}, \text{phuntary: \psi \text{wt (F1)}, \text{spicen.} \\ \psi \text{tyt (Pf/F1f)}
		F1f: 0 – 1.84 – 4.59 – 176	Reproductive: No effect of treatment on:
		- 1808	precoital interval; mating, fertility, or
			gestation indices; or gestation duration in
			either generation. Furthermore, the numbers
		1	of primordial ovarian follicles in the 20,000
			ppm F1 dams were comparable to controls.
			No effects were noted on estrous cycle
			duration or sperm parameters. The NOAEL is
			20,000 ppm (1307/1577 mg/kg/day
			males/females, respectively). The LOAEL for
			reproductive toxicity was not observed.
			Offspring: NOAEL = 3.30 mg/kg/day;
			LOAEL = 131 mg/kg/day based on: liver: \(\frac{1}{2}\)
			[hepatocyte hypertrophy, diffuse fatty change
			brown pigment deposition, proliferation bile
			ducts; wt]; thyroid: †follicular cell
			hypertrophy; spleen + thymus: \underwite wt; \underwite yeball
			enlargement
	One-generation	46817239	Parental: LOAEL is 2000 ppm (127.2/148.9
	reproduction study	(2004)/Acceptable/nongui	mg/kg/day in amles/females, respectively)
	in rat	deline	bsed on effects on the liver, thyroid, and
	1	ppm:	kidneys. The NOAEL is 200 ppm
		0-50-200-2000-20,000	(12.91/14.97 mg/kg/day in males/females,
		mg/kg/day:	respectively).
		Pm: 0-3.25-12.91-127.2-	Reproductive: The LOAEL was not observed
		1287	and the NOAEL is 20,000 ppm (1287/1490
		Pf: 0-3.84-14.97-148.9-	mg/kg/day in males/females, respectively).
		1490	Offspring: The LOAEL is 2000 ppm
		1770	
			(127.2/148.9 mg/kg/day in males/females,
			respectively) based on effects on the eyes and
			liver; and on increased anogenital distance
			and delayed sexual maturation in the males.
			The NOAEL is 200 ppm (12.91/14.97
			mg/kg/day in males/females, respectively).

Guideline No.	Study Type	MRID No. (year)/	Results
		Classification /Doses	
	Histopathology of the Eyes of Weanlings in a	46817238/Acceptable/non -guideline ppm:	Offspring: The LOAEL for offspring toxicity is 2000 ppm (127.2/148.9 mg/kg/day in males/females, respectively) bsed on
	One-generation Reproduction	0-50-200-2000-20,000 mg/kg/day:	confirmed microscopic effects on the eyes in both sexes. The NOAEL is 200 ppm
	Study in Rats	Pm: 0-3.25-12.91-127.2- 1287 Pf: 0-3.84-14.97-148.9- 1490	(12.91/14.97 mg/kg/day in males/females, respectively).
	Perinatal Ocular Toxicity Study in CD-1 Mice following exposure	46817236/ non-guideline approx. 1000 mg/kg/day from day 6 post conception until lactation	Eye lesions of viable pups were noted neither during the lactation period nor during the follow-up period lasting from PND 22-42.
	via diet	day 21	Offspring: The LOAEL for offspring toxicity is 4500/2000 ppm (equivalent to 1052.3 mg/kg/day) based on decreased pup body weights and body weight gains. The NOAEL was not established.
870.4100a	Chronic toxicity (rat)	46817217 (2004)/ Acceptable/guideline ppm: 0 - 20 - 50 - 2000 - 20000	NOAEL (F) = 2.4 mg/kg/day. LOAEL (F) = 97.5 mg/kg/day based on: hepatotoxicity (periportal fatty change, hepatocyte hypertrophy, †wt [abs/rel] and †GGT
		mg/kg/day: M: 0 - 0.8 - 2.0 - 79.3 - 822 F: 0 - 1.0 - 2.4 - 97.5 - 998	
870.4100Ь	Chronic toxicity (dog)	Acceptable/guideline ppm: 0 - 100 - 1500 - 20000 mg/kg/day:	NOAEL (M/F) = $2.21 / 2.51$ mg/kg/day. LOAEL (M/F) = $35.2 / 37.9$ mg/kg/day based on: liver: \uparrow wt [abs m+f, rel(m)] \downarrow (m) – BWG and BW \downarrow –[APTT(m/f),
		M: 0 - 2.21 - 35.2 - 484 F: 0 - 2.51 - 37.9 - 533	↑ -[AFT I (III/1), ↑(m/f) - ALP
870.4200a	Carcinogenicity (rat)	46817219 (2004)/ Acceptable/guideline	NOAEL $(M/F) = 1.70 / 2.15 \text{ mg/kg/day}$. LOAEL $(M/F) = 33.9 / 43.7 \text{ mg/kg/day}$ based
		ppm: 0 - 50 - 1000 - 20000 mg/kg/day: M: 0 - 1.70 - 33.9 - 705	on: liver: \(\frac{1}{m}\frac{f}{f}\) [periportal fatty change, hypertophy]; \(\frac{1}{m}\text{to [abs/rel(m/f)]; kidney:} \(\frac{1}{m}\frac{f}{f}\) chronic nephropathy; \(\frac{1}{m}\text{to [rel(f)]}\) No evidence of carcinogenicity
870.4200ь	Carcinogenicity (mouse)	F: 0 – 2.15 – 43.7 – 912 46817220 (2004)/ Acceptable/guideline	NOAEL (M/F) = 4.85 / 4.44 mg/kg/day. LOAEL (M/F) = 94 / 93 mg/kg/day based on: henatotoxicity (periportal fatty changes
		ppm: 0 - 50 - 1000 - 10000 mg/kg/day:	hepatotoxicity (periportal fatty changes, hypertophy); thyroid changes (†follicular cell hypertrophy with hydropic change, †large
		M: 0 – 4.85 – 94 – 988 F: 0 – 4.44 – 93 – 937	sized follicles) No evidence of carcinogenicity

Guideline No.	Study Type	MRID No. (year)/	Results
Guidellie 110.	Study Type	Classification /Doses	Results
870.5100	Gene mutation	46817221	NT
870.3100			Negative
	(in vitro bacteria)	Acceptable/guideline	
		0 - 3.86 - 11.6 - 34.7 -	
		104 – 313	
		μg/plate (w/o activation)	
		0 - 61.7 - 185 - 556 -	
		1,670 – 5,000	
		μg/plate (+ activation)	
870.5100	Gene mutation	46817222	Negative
	(in vitro bacteria)	Unacceptable/guideline	
		0-16-50-158-500-	
		1581 – 5000 μg /plate (+/-	
		S9 activation)	
		(conducted w/ NNI-0001	
		SC)	
870.5300	Gene Mutation	46817224	Negative
070.5500	(in vitro	Acceptable/guideline	14egative
	mammalian V79)	0 - 7.5 - 15 - 30 - 60	
	mammanan v /9)	i	
		120 – 240	
0=0 =0==		μg/ml (+/ – activation)	
870.5375	Mammalian	Acceptable/guideline	Negative
	Cytogenetics (in	0 - 550 - 1100 - 2200	
	vitro CHL)	μg/ml (+ activation)	
		0 – (125-550) – (250-	
		1100) – (500-2200)	
		μg/ml; 6, 20, or 40 hrs	
		exp. (w/o activation)	
870.5395	Mammalian	46817226	Negative
	Cytogenetics	Acceptable/guideline	
	(micronucleus	0 - 1000 - 2000 - 4000	
	mouse)	mg/kg	
870.5395	Mammalian	46817225	Negative
	Cytogenetics	Acceptable/guideline	1 Toguti ve
	(micronucleus	0 - 500 - 1000 - 2000	
	mouse)	mg/kg	
870.6200a			NOAFI 2212 / /1
670.0200 a	Acute neurotoxicity	46817227	NOAEL = 2213 mg/kg/day
	screening battery	Acceptable/guideline	LOAEL = Not observed (>2213 mg/kg/day)
		mg/kg/day:	
		0 - 209 - 731 - 2213	
		(analytically determined)	
870.6300	Developmental	46817228	Maternal: NOAEL = 9.9 mg/kg/day
	neurotoxicity	Acceptable/non-guideline	LOAEL = 99.5 mg/kg/day based on: liver:
		ppm:	↑wt[abs/rel].
		0 – 120 – 1200 – 12000	Offspring: NOAEL = 9.9 mg/kg/day
		ppm	LOAEL = 99.5 mg/kg/day based on
		mg/kg/day (based on last	†balanopreputial separation time: this LOAE
		2 wks of gestation	is also protective of adverse eye effects
		and 3 wks of lactation):	reported at 979.6 mg/kg/day (eye – [enlarged]
		0 - 9.9 - 99.5 - 979.6	eyeball + exophthalamus + general ocular
		1 2.5 22.5 27.5	opacity(m)])

	ronic and Other Toxi		
Guideline No.	Study Type	MRID No. (year)/ Classification /Doses	Results
870.7485	Metabolism and pharmacokinetics - rat	46817229, 46817230 and 46817231 Acceptable/guideline	Oral absorption = 23.5/34.1% in m/f, respectively (average = 29%); see Section 3.2 Appendix A.3 for more information
870.7600	Dermal penetration (monkey)	46817234 Acceptable/non-guideline	Intravenous injection of [14C]NNI-0001 resulted in excretion of a large fraction of the dosed radioactivity in feces. Total recoveries through 360 hours post-dose were 80.91% in feces, 7.78% in urine, and 4.11% in cage debris/rinse samples. Dermal application of [14C]NNI-0001 resulted in a negligible absorption of 0.02% at 8 hrs post-dose. The overall mean total recovery of radioactivity from excreta and from the application site was 105.15%, the majority of which was associated with the radioactivity recovered from the application site.
870.7800	4-week Immunotoxicity (plaque-forming assay in rat)	Acceptable/guideline ppm: 0-40-400-4000 mg/kg/day: M: 0-3.34-33.6-336.3 F: 0-4.0-38.4-358.8	NOAEL (M/F) = 336/358.8 mg/kg/day. No evidence of primary immunotoxicity
	Effects on Thyroid Hormones and Liver Enzymes in Female Rats	A6817235 Acceptable/non-guideline ppm: 0-1000-10,000 mg/kg/day: 0-83-812	Study generally support this indirect effect on the thyroid via induction of enzymes in the liver. Direct effects on the liver included increases in organ weights, cytochrome P450, UDP-GT and EROD activities, and incidences of hepatocyte hypertrophy and vacuolation.
	In vitro Metabolism in rat, mouse, dog and human microsomes	46817232 Acceptable/Non-guideline	see Appendix A.3 for more information
	Toxicokinetic study in rats and mouse	46817233 Acceptable/Non-guideline	see Appendix A.3 for more information

^{*}The studies designated as "Not Submitted" were included in the registrant's toxicity profile table, which in turn was in the registrant's human health risk assessment (MRID 46817252, p. 42); there are reported here in order to be as thorough, complete and inclusive as possible.

Appendix 4 – Ecological Effects Data

Guidelin	ne #	Data Requirement	Formulation	MRID (Accession #)	Study Classification
71-1	850.2100	Avian Oral LD ₅₀	Technical	46817003	Acceptable
		31.1 31 2.2.30	480 SC	46817004	Acceptable
71-2	850.2200	Avian Dietary LC ₅₀	Technical	46817005	Acceptable
			Technical	46817006	Acceptable
71-4	850.2300	Avian Reproduction	Technical	46817007	Supplemental
, .	020.2300	Trian Reproduction	Technical	46817008	Acceptable
72-1	850.1075	Freshwater Fish LC ₅₀	Technical	46816937	Acceptable
, 2 1	050.1075	110011 Water 1 1011 15 250	Technical	46816939	Acceptable
			Technical	46816940	Acceptable
			Technical	46816941	Acceptable
			480 SC	46816942	Acceptable
			480 SC	46816943	Acceptable
72-2	850.1010	Freshwater	Technical	46816930	Acceptable
12 2	050.1010	Invertebrate LC ₅₀	24 WG	46816932	Acceptable
		mvorteorate LC50	480 SC	46816931	Acceptable
			480 SC 480 SC	46816934	Supplemental
			Des-iodo	46816933	Acceptable
72-3(a)	850.1075	Estuarine/Marine	Technical	46816938	
		Fish LC ₅₀			Acceptable
72-	850.1025	Estuarine/Marine	Technical	46816935	Acceptable
3(b)		Mollusk EC ₅₀			
72-3(c)	850.1035	Estuarine/Marine	Technical	46816936	Acceptable
	850.1045	Shrimp LC ₅₀			
72-4(a)	850.1400	Freshwater Fish	Technical	46816947	Acceptable
		Early Life Stage			
72-	850.1300	Aquatic Invertebrate	Technical	46816944	Supplemental
4(b)	850.1350	Life-cycle	Technical	46816946	Acceptable
	850.1300	-	480 SC	46816945	Acceptable
	850.1790	Benthic Organisms	Technical	46817022	Supplemental
		•	24 WG	46817014	Acceptable
			480 SC	46817013	Acceptable
			Des-iodo	46817023	Supplemental
		Mesocosm Study	480 SC	46817002	Supplemental
72-5	850.1500	Freshwater Fish Life-Cycle	Technical	46816948	Unacceptable
122-	850.4100	Seed Germination/	24 WG	46817034	Acceptable
1(a)		Seedling Emergence	480 SC	46817036(a)	Acceptable
- (-)		Tier 1	.5550	1301/330(4)	riccopuloic
		Herbicidal Toxicity	480 SC	46817035	Supplemental, Non
		Terrestrial plants	100 50	1001/055	guideline
		Tier 2			guidellile
122-	850.4150	Vegetative Vigor	Technical	46817036(b)	Acceptable
1(b)	330.4130	Tier 1	24 WG	46817037	Supplemental
122-2	850.4400	Aquatic Plant (Non-	Technical	46817041	Acceptable
122-2	050.7700	Vascular)	480 SC	46817041	
		Tier 1&II	400 SC	7001/040	Acceptable
122-2	850.4400	Aquatic Plant	Technical	46817039	A coontable
122-2	030.4400		i ecimicai	4001/039	Acceptable
	1	(Vascular)			1

Ecolog	Ecological Effects Data Requirements for Flubendiamide					
Guideline #		Data Requirement Formulation		MRID (Accession #)	Study Classification	
123- 1(a)	850.4225	Seed Germination/ Seedling Emergence Tier 2	24 WG	46817038	Acceptable	
141-1	850.3020	Honey Bee Acute Contact LD ₅₀	Technical 480 SC 480 SC WG 40	46817009 46817010 46817011 46817012	Acceptable Acceptable Acceptable Supplemental, Nonguideline	
	850.6200	Acute Toxicity to Earthworms	Technical 480 SC Des-iodo	46817028 46817029 46817030	Supplemental Supplemental Supplemental	
	850.6200	Chronic Toxicity to Earthworms	480 SC 24 WG	46817031 46817032	Supplemental Supplemental	
141-2	850.3030	Honey Bee Residue on Foliage	NA	NA	NA	
		Parasitoid Wasp Predatory Mite	WG 40 WG 40	46817020 46817019	Supplemental, Non- guideline Supplemental, Non-	
		Ladybird Beetle (45 day study)	480 SC	46817015	guideline Supplemental, Non- guideline	
		Ladybird Beetle (Extended Study)	480 SC	46817016	Supplemental, Non- guideline	
		Ladybird Beetle (Life Cycle Test)	480 SC	46817017	Supplemental, Non- guideline	
		Parasitic Wasp (Side Effects Tests)	480 SC	46817021	Supplemental, Non- guideline	
		White springtail (Reproduction Test) Green lacewing	480 SC	46817027	Supplemental	
		(Extended Study)	480 SC	46817018	Supplemental	

Appendix 5 – Environmental Fate Data

Guideline #		Data Requirement	MRID #s	Study Classification
161-1	835.212	Hydrolysis	46816907	Acceptable
161-2	835.224	Photodegradation in Water	46816908	Acceptable
161-3	835.241	Photodegradation on Soil	46816909	Acceptable
161-4	835.237	Photodegradation in Air	NA¹	NA
162-1	835.41	Aerobic Soil Metabolism	Parent: 46816910 Degradate:46816911	Acceptable Acceptable
162-2	835.42	Anaerobic Soil Metabolism	46816912	Supplemental
162-3	835.44	Anaerobic Aquatic Metabolism	46816914	Acceptable
162-4	835.43	Aerobic Aquatic Metabolism	46816913	Acceptable
163-1	835.1240 835.1230	Leaching- Adsorption/Desorption	Parent: 46816905 Degradate: 46816906	Supplemental Supplemental
163-2	835.141	Laboratory Volatility	NA	NA
163-3	835.81	Field Volatility	NA	NA
164-1	835.61	Terrestrial Field Dissipation	46816915 46816916 46816917	Acceptable Acceptable Acceptable
165-4	850.173	Accumulation in Fish	46816949 46817001	Acceptable Acceptable
		Quantum Yield in Water	46816919	Supplemental

Appendix 6 - Bibliography

MRID	Citation Reference
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Howers, L. (2005) Technical NNI 0001: A Subacute Dietary LC50 with Mallards. Project Number: AS720801, 201263. Unpublished study

Citation Reference

Citation Reference

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71-4 Avian Reproduction

MRID

MRID

46817007	Sabbert, T. (2004) Effect of Technical NNI 0001 on Mallard Reproduction. Project Number: EBAM0221. Unpublished study prepared by Bayer Corp. 114 p.
46817008	Bowers, L. (2005) Effect of Technical NNI 0001 on Northern Bobwhite Reproduction. Project Number: AS741701, 201138. Unpublished study prepared by Bayer Corp. 143 p.

72-1 Acute Toxicity to Freshwater Fish

46816937	Kern, M.; DeHann, R. (2004) Acute Toxicity of NNI 0001 Technical to
	the Fathead Minnow (Pimephales promelas) Under Static Conditions.
	Project Number: EBAM0390/AS811201, 200713. Unpublished study
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Dorgerloh, M. (2003) Acute Toxicity of NNI-0001 480 SC to Fish (Oncorhynchus mykiss). Project Number: E/280/2354/4, DOM/22082, 00789. Unpublished study prepared by Bayer Ag, Institute of Product

Info. & Residue Anal. 42 p.

72-2 Acute Toxicity to Freshwater Invertebrates

MRID	Citation Reference
46816930	Dorgerloh, M. (2006) Acute Toxicity of NNI-0001 (tech.) in Water Fleas (Daphnia magna). Project Number: DOM/22041, E/320/2283/0, MR/391/02. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 39 p.
46816931	Dorgerloh, M. (2003) Acute Toxicity of NNI-0001 SC 480 to Water Fleas (Daphnia magna). Project Number: E/320/2284/1, DOM/22042. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 43 p.
46816932	Dorgerloh, M. (2005) Acute Toxicity of NNI-0001 WG 24 to the Waterflea Daphnia magna in a Static Laboratory Test System. Project Number: P/684/027017, MR/188/02, EBAMX018. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 58 p.
46816933	Dorgerloh, M. (2004) Acute Toxicity of NNI-0001-des-iodo to the Waterflea Daphnia magna. Project Number: DOM/23055, MR/029/04, E/320/2503/5. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 43 p.
46816934	Dorgerloh, M. (2005) Acute Toxicity of NNI-0001 SC 480 in the Waterflea Dahnia magna Under Different Feeding Conditions in a Static Laboratory Test System. Project Number: E/320/2849/8, EBAMX028, MR/188/02. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 59 p.
72-3 Acute Toxicity to Estuarine/Marine Organisms	
MRID	Citation Reference
46816935	Dionne, E. (2004) NNI-0001-Acute Toxicity to Eastern Oysters (Crassostrea virginia) Under Flow-Through Conditions. Project Number: AS881501, 13798/613, EBAM0380. Unpublished study prepared by Springborn Smithers Laboratories. 53 p.
46816936	Dionne, E. (2004) NNI-0001 - Acute Toxicity to Mysids (Americamysis bahia) Under Static Conditions. Project Number: 13798/6131, AS883101, EBAMO376. Unpublished study prepared by Springborn Smithers Laboratories. 49 p.
46816938	Banman, C.; Kern, M.; Lam, C. (2004) Acute Toxicity of NNI 0001 Technical to the Sheepshead Minnow (Cyprinodon variegatus) Under Static Conditions. Project Number: 200992, EBAM0370. Unpublished

study prepared by Bayer Corp. 31 p.

72-4 Fish Early Life Stage/Aquatic Invertebrate Life Cycle Study MRID Citation Reference

46816944	Dorgerloh, M. (2003) Influence of NNI-0001 (Tech.) on Development and Reproductive Output of the Waterflea Daphnia magna in a Static Renewal Laboratory Test System. Project Number: E/321/2267/3, DOM/22035, 00760. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 88 p.
46816945	Dorgerloh, M. (2003) Influence of NNI-0001 SC 480 on Development and Reproductive Output of the Waterflea Daphnia magna in a Static Renewal Laboratory Test System. Project Number: E/321/2372/0, DOM/23001, 00760. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 81 p.
46816946	Putt, A. (2005) NNI-0001 - Life-Cycle Toxicity Test with Mysids (Americamysis bahia). Project Number: 13798/6156, EBAMO377. Unpublished study prepared by Springborn Smithers Laboratories. 89 p.
46816947	Kern, M; Lam, C. (2004) Early Life Stage Toxicity of NNI 0001 Technical to the Fathead Minnow (Pimephales promelas) Under Flow-Through Conditions. Project Number: EBAMX005, 200995, AS841201. Unpublished study prepared by Bayer Corp. 86 p.

72-5 Life cycle fish

MRID

Citation Reference

Cafarella, M. (2005) NNI-0001 - The Full Life-Cycle Toxicity Test with Fathead Minnow (Pimphales promelas). Project Number: 13798/6155, EBAM0393. Unpublished study prepared by Springborn Smithers Laboratories. 141 p.

72-6 Aquatic org. accumulation

MRID

Citation Reference

Dorgerloh, M.; Weber, E. (2005) (Carbon 14)-NNI-0001-Bioconcentration and Biotransformation in Fish (Lepomis macrochirus). Project Number: DOM/23026, E/244/2330/8. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 156 p.

122-1 Seed Germination/Seedline Emergence and Vegetable Vigor MRID Citation Reference

46817036

Christ, M.; Lam, C. (2005) Tier I Seedling Emergence and Vegetative Vigor: Nontarget Phytotoxicity Study Using NNI-0001 480SC. Project Number: 201376, EBAMX007, EBAM0367. Unpublished study prepared by Bayer Corp. 62 p.

123-1 Seed germination/seedling emergence and vegitative vigor MRID Citation Reference

46817038

Christ, M.; Lam, C. (2006) Tier II Seedling Emergence: Nontarget Phytotoxicity Study using NNI-0001 WG24. Project Number: EBAMX049. Unpublished study prepared by Bayer Corp. 32 p.

123-2 Aquatic plant growth

MRID

Citation Reference

46817039

Kern, M.; Banman, C.; Lam, C. (2004) Toxicity of NNI 0001 Technical to Duckweed (Lemna gibba G3) Under Static-Renewal Conditions. Project Number: EBAMX010, AS883701, 200604. Unpublished study prepared by Bayer Corp. 41 p.

132-1 Dissipation of Dislodgeable Foliar & Soil Residues

MRID

Citation Reference

46817245

Fischer, D. (2006) NNI-0001 480 SC - Dislodgeable Foliar Residue on Sweet Corn and Grape Plant Foliage: Final Report. Project Number: RAAMY004, AM001/05DA, AM002/05D. Unpublished study prepared by Bayer Corp. 494 p.

161-1 Hydrolysis

MRID

Citation Reference

46816907

Yamashita, A. (2001) Hydrolysis Study of NNI-0001: Final Report. Project Number: LSRC/A01/078A, GC/03, 01/0034. Unpublished study prepared by Nihon Nohyaku Co., Ltd. 56 p.

161-2 Photodegradation-water

MRID

Citation Reference

46816908

Motoba, K. (2005) Study on Aqueous Photolysis of NNI-0001: Final Report (Amended II). Project Number: GC/03, LSRC/A01/128A, 01/0036. Unpublished study prepared by Nihon Nohyaku Co., Ltd. 88 p.

161-3 Photodegradation-soil

MRID

Citation Reference

46816909

Shepler, K. (2004) Photodegradation of [(Carbon 14)]NNI-0001 in/on Soil by Artificial Light. Project Number: 1050W/1, 1050W. Unpublished study prepared by PTRL West, Inc. 141 p.

162-1 Aerobic soil metabolism

MRID

Citation Reference

46816910

Babczinski, P.; Eberhardt, R. (2004) NNI-0001: Aerobic Soil Degradation/Metabolism in Four Different Soils. Project Number: MEF/04/280, M1251206/7, M/125/1206/7. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 123 p.

46816911

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162-2 Anaerobic soil metabolism

MRID

Citation Reference

46816912

Hellpointner, E. (2004) Anaerobic Degradation/Metabolism of NNI-0001 in Soil. Project Number: M1261225/9, MEF/04/067, M/126/1225/9. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 56 p.

162-3 Anaerobic aquatic metab.

MRID

Citation Reference

46816914

Mathew, A. (2005) [Phthalic Acid Ring-UL-(Carbon 14)]NNI-0001: Anaerobic Aquatic Metabolism. Project Number: AS042401, MEAM6026. Unpublished study prepared by Bayer Corp. 72 p.

163-1 Leach/adsorp/desorption

MRID

Citation Reference

46816905

Babczinski, P.; Heinemann, O. (2004) Adsorption/Desorption of NNI-0001 on Soils. Project Number: M1311243/5, MR/201/03, M/131/1243/5. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 75 p.

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164-1 Terrestrial field dissipation

104-1 Terrestrial field dissipation	
MRID	Citation Reference
46816916	Lee, R. (2006) Terrestrial Field Dissipation of NNI-0001 in Mississippi Soil, 2003. Project Number: 03EFAMY002, AS022102, AM/001/S04/01. Unpublished study prepared by Bayer Corp., A & L Great Lakes Laboratories and Bayer CropScience Mississippi Field Station. 186 p.
46816917	Lee, R. (2006) Terrestrial Field Dissipation of NNI-0001 in Washington Soil, 2003. Project Number: 03EFAMY003, AS022103, AM/001/S04/01. Unpublished study prepared by Bayer Corp., A & L Great Lakes Laboratories and Agvise Inc. 192 p.
165-4 Bioa	accumulation in fish
MRID	Citation Reference
46816949	Dorgerloh, M.; Weber, E. (2005) (Carbon 14)-NNI-0001-Bioconcentration and Biotransformation in Fish (Lepomis macrochirus). Project Number: DOM/23026, E/244/2330/8. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 156 p.
171-11 To	bacco Uses: Total Residues and Pyrolysis Products
MRID	Citation Reference
46817244	Ponte, M.; Schick, M. (2006) Tobacco Pyrolysis of [14-Carbon]NNI-0001. Project Number: 1426W/1, 1426W, RAAMX049. Unpublished study prepared by PTRL West, Inc. 94 p.
830.1550 I	Product Identity and composition
MRID	Citation Reference
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished

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	Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
46816904	Frank, J. (2006) Product Chemistry of NNI-0001 24 WG. Project Number: ANR/06406, ANR/06606, ANR/06706. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 155 p.
830.1600	Description of materials used to produce the product
MRID	Citation Reference
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
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830.1620	Description of production process
MRID	Citation Reference
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
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830.1650	Description of formulation process
MRID	Citation Reference
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.

46816904	Frank, J. (2006) Product Chemistry of NNI-0001 24 WG. Project Number: ANR/06406, ANR/06606, ANR/06706. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 155 p.
830.1670	Discussion of formation of impurities
	Citation Reference
MRID	Citation Reference
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
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46816904	Frank, J. (2006) Product Chemistry of NNI-0001 24 WG. Project Number: ANR/06406, ANR/06606, ANR/06706. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 155 p.
830.1700	Preliminary analysis
MRID	Citation Reference
MINI	Charles Reserved
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
830.1750	Certified limits
MRID	Citation Reference
MICE	Change Activities
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
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	prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 155 p.
830.1800	Enforcement analytical method
MRID	Citation Reference
46816901	Fontaine, L. (2006) Product Chemistry of NNI-0001 Technical. Project Number: BR/2485, VB1/2005/0013501, ANR/07406. Unpublished study prepared by Bayer Corp and Bayer Ag, Institute of Product Info. & Residue Anal. 474 p.
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830.6302	Color
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
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830.6303	Physical state
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
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830.6304 MRID	Odor Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
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830.6313 metal ions	Stability to sunlight, normal and elevated temperatures, metals, and
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.6314	Oxidizing or reducing action
MRID	Citation Reference
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.6315	Flammability
MRID	Citation Reference
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.6316	Explodability
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A.

	Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.6317	Storage stability of product
MRID	Citation Reference
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.6320	Corrosion characteristics
MRID	Citation Reference
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.7000	pH of water solutions or suspensions
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.7050	UV/Visible absorption
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.7100	Viscosity
MRID	Citation Reference

46816903	Frank, J. (2006) Product Chemistry of NNI-001 480 SC. Project Number: ANR/05806, 14/1050/5280, 2001/0054102/02E. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Bayer Ag Institut fuer Ruckstands-Analytik. 93 p.
830.7200	Melting point/melting range
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.7300	Density/relative density
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
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830.7370	Dissociation constant in water
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.7560	Partition coefficient (n-octanol/water), generator column method
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.7840	Water solubility: Column elution method, shake flask method
MRID	Citation Reference

46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
830.7950	Vapor pressure
MRID	Citation Reference
46816902	Folsom, B. (2005) Product Chemistry of NNI-0001 Technical: (Final Report). Project Number: 608/58, GE/03/01/0008, LSRC/A01/012A. Unpublished study prepared by Bayer Corp, Bayer Ag, Institute of Product Info. & Residue Anal. and Covance Laboratories, Ltd. 287 p.
835.1240	Soil column leaching
MRID	Citation Reference
46816906	Volkel, W. (2005) Adsoprtion/Desorption of [(Carbon 14)]-NNI-001-DES-IODO on Soils. Project Number: 855843. Unpublished study prepared by RCC Umweltchemie Ag. 108 p.
835.2120	Hydrolysis of parent and degradates as a function of pH at 25 C
MRID	Citation Reference
46816907	Yamashita, A. (2001) Hydrolysis Study of NNI-0001: Final Report. Project Number: LSRC/A01/078A, GC/03, 01/0034. Unpublished study prepared by Nihon Nohyaku Co., Ltd. 56 p.
835.2240	Direct photolysis rate of parent and degradates in water
MRID	Citation Reference
46816908	Motoba, K. (2005) Study on Aqueous Photolysis of NNI-0001: Final Report (Amended II). Project Number: GC/03, LSRC/A01/128A, 01/0036. Unpublished study prepared by Nihon Nohyaku Co., Ltd. 88 p.
835.2410	Photodegradation of parent and degradates in soil
MRID	Citation Reference
46816909	Shepler, K. (2004) Photodegradation of [(Carbon 14)]NNI-0001 in/on Soil by Artificial Light. Project Number: 1050W/1, 1050W. Unpublished study prepared by PTRL West, Inc. 141 p.

835.4100	Aerobic soil metabolism
MRID	Citation Reference
46816910	Babczinski, P.; Eberhardt, R. (2004) NNI-0001: Aerobic Soil Degradation/Metabolism in Four Different Soils. Project Number: MEF/04/280, M1251206/7, M/125/1206/7. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 123 p.
46816911	Fliege, R. (2004) [Phthalic Acid Ring-UL-(Carbon 14)]-and [Aniline Ring-UL-(Carbon 14)]-NNI-0001-des-iodo: Aerobic Soil Metabolism in Four Soils. Project Number: M1251289/8, MEF/04/388, M/125/1289/5. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 114 p.
835.4200	Anaerobic soil metabolism
MRID	Citation Reference
46816912	Hellpointner, E. (2004) Anaerobic Degradation/Metabolism of NNI-0001 in Soil. Project Number: M1261225/9, MEF/04/067, M/126/1225/9. Unpublished study prepared by Bayer Ag, Institute of
	Product Info. & Residue Anal. 56 p.
835.4300	Aerobic aquatic metabolism
MRID	Citation Reference
46816913	Sneikus, J. (2004) Aerobic Degradation and Metabolism of NNI-0001 in the Water/Sediment System. Project Number: M1511248/2, MEF/414/03, M/151/1248/2. Unpublished study prepared by Bayer Ag, Institute of Product Info. & Residue Anal. 91 p.
835.4400	Anaerobic aquatic metabolism
MRID	Citation Reference
46816914	Mathew, A. (2005) [Phthalic Acid Ring-UL-(Carbon 14)]NNI-0001: Anaerobic Aquatic Metabolism. Project Number: AS042401, MEAM6026. Unpublished study prepared by Bayer Corp. 72 p.
835.6100	Terrestrial field dissipation
MRID	Citation Reference
46816915	Lee, R. (2006) Terrestrial Field Dissipation of NNI-0001 in California Soil, 2003. Project Number: 03EFAMY001, AS022101. Unpublished study prepared by Bayer Corp., A & L Great Lakes Laboratories and

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