



Isopyrazam

**Response to the OEHHA Request for Relevant Information
on Isopyrazam
As a Chemical Being Considered for Listing on Proposition
65 by the Authoritative Bodies Mechanism**

DATA REQUIREMENT(S): Not Applicable

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1.0 INTRODUCTION

The California Office of Environmental Health Hazard Assessment (OEHHA) requested relevant information regarding whether isopyrazam meets the criteria for listing as known to the state to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 also known as Proposition 65. This action is being proposed under the authoritative bodies listing mechanism process under Proposition 65.

Isopyrazam is a pyrazole carboxamide and belongs to the ortho-substituted phenyl amides (OPAs) class of fungicides. The active ingredient was submitted to the USEPA to establish an import tolerance on banana treated in Central and South America. It is used to control black sigatoka in banana which is a disease that causes leaf spotting that can ultimately lead to significantly reduced yields and / or plant loss for the grower.

The purpose of this document is to provide information regarding the potential listing.

2.0 CRITERIA TO IDENTIFY ISOPYRAZAM FOR LISTING UNDER THE AUTHORITATIVE BODIES MECHANISM OF PROPOSITION 65

According to the February 10, 2012 notice OEHHA indicates USEPA published a report on isopyrazam, entitled *Cancer Assessment Document, Evaluation of the Carcinogenic Potential of Isopyrazam* during the evaluation of isopyrazam for an import tolerance petition for use on bananas. USEPA, which is identified as an authoritative body, concluded that isopyrazam is “likely to be carcinogenic to humans”. The notice indicates that this report appears to meet the requirements for a formal identification and sufficiency of evidence criteria in the Proposition 65 regulations. The USEPA classification is based on the presence of thyroid follicular cell tumors in male rats, and liver and uterine tumors in female rats at doses adequate to evaluate the carcinogenic potential of isopyrazam.

3.0 RELEVANT INFORMATION FOR CONSIDERATION OF SUFFICIENCY FOR LISTING

Syngenta is currently conducting studies to understand the mode of action for high-dose tumors in rats with isopyrazam. These mechanistic studies are designed to identify the key events that occur in rats at earlier time points and are necessary steps in the process leading to tumor formation. An understanding of the mode of action can be used to determine a threshold dose below which tumors will not occur, and aid in determining whether the rodent mode of action is relevant to humans. If it is determined that the mode of action is not relevant to humans then it is anticipated that EPA would re-evaluate the current toxicity profile and change their current cancer classification.

4.0 CONCLUSIONS

The notice indicated that isopyrazam is not registered by USEPA for use as a fungicide in the United States and therefore, it cannot be sold nor distributed for sale. It is registered for use in South and Central America to control black sigatoka, a potentially devastating disease on bananas. There is no direct exposure to the residents of California because there is no product that contains this chemical available in the state. The only possible exposure to residents of California is indirectly through potential residues on imported bananas. However, potential residues have been demonstrated to be low since USEPA established import tolerances for isopyrazam in banana of only 0.05 mg/kg. In addition USEPA has evaluated the potential residues on imported bananas and concluded in the Final Rule published in the Federal Register on October 5, 2011, that “there is a reasonable certainty that no harm will result to the general population or to infants and children from aggregate exposure to isopyrazam residues.” Syngenta believes it is not necessary to list isopyrazam on Proposition 65, because there is no potential for direct exposure as noted above.