UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JAN 4 1985

MEMORANDUM

SUBJECT: RCB Review of IBT Validation Report. Milk and Meat Residue Study with Glyphosate and Aminomethylphosphonic Acid.IBT #651-3775. Addendum of 9/10/84.

FROM: Edward Zager, Section Head,
Special Registration Section 2
Residue Chemistry Branch,
Hazard Evaluation Division (TS-769)

Edward Zager

TRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

To: Vicki Walters
PM-25, Registration Division (TS-767)

RCB classified IBT study #651-3775 as invalid due to the lack of feed consumption data. We expressed particular concern that the addition of the glyphosate:aminomethylphosphonic acid mixture to the diet rendered it unpalatable thus causing the amount of test material consumed by the cows to be significantly less than stated in the protocol.

To validate the study, Monsanto has now submitted the results of a study in which 3 lactating dairy cattle received concentrate diets fortified with 400 ppm glyphosate and aminomethylphosphonic acid in a 3:1 ratio. Three controls were administered non-fortified diets. The feeding of concentrate diets did not result in any significant differences in feed consumption, milk production or animal health or behavior.

RCB now considers the Milk and Meat Residue Study with Glyphosate and Aminomethylphosphonic Acid to be valid.

cc:R.F., Circu, Reviewer, S.F. (Glyphosate)
TS-769:E. Zager:Revised by:wh:1/4/84

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