

**AN UPDATE ON GRIFFIN CORPORATION'S
ACTIVITIES TO MAINTAIN CYANAZINE
REGISTRATIONS**

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Abstract

Cyanazine, a triazine, has been a foundation herbicide for corn production in the United States since its introduction in 1971 by Shell. Cyanazine provides cost effective, broadspectrum control of 15 grasses and 41 broadleaf weeds as well as rotational flexibility, application flexibility, and resistance management. E.I. du Pont de Nemours and Company (DuPont) acquired cyanazine from Shell in 1987 and was the sole manufacturer until Griffin Corporation's entry into the cyanazine market. Griffin Corporation, a basic manufacturer and marketer of post-patent agricultural chemicals, acquired a facility for cyanazine synthesis in 1994.

In November 1994, the Environmental Protection Agency (EPA) initiated a special review of the triazine herbicides (cyanazine, atrazine, and simazine). The Triazine Special Review focused on two areas, an exposure issue centered on ground and surface water contamination and a toxicology issue centered on cancer effects. Griffin planned to respond to the special review by conducting toxicological and environmental studies combined with label modifications. With this strategy in place, Griffin filed technical and end-use registrations with the EPA in February 1995. The technical was ruled "substantially similar" to DuPont's technical by the EPA in June. Being ruled "substantially similar" allowed Griffin to cite specific DuPont studies which were necessary to secure registration. Normally, registrations are rapidly issued after this ruling, but Griffin did not receive its technical registration until September 1995. During the delay, negotiations between Dupont and EPA culminated in an agreement announced in August 1995 to voluntarily phase-out cyanazine. The provisions of the agreement included the following; 1) cyanazine would be available for sale through December 31, 1999 and legal to use through December 31, 2002, and 2) use rate reductions were implemented - maximum of 5 lb/acre beginning January 1, 1997, maximum of 3 lb/acre for the 1998 use season, and 1 lb/acre starting in 1999 through 2002. Griffin was "required" to agree to the EPA/DuPont phase-out in order to receive its technical and subsequent end-use registrations (cyanazine 4L in November 1995 and cyanazine 90DF, cyanazine+atrazine 4L and DF registrations in February 1996).

To extend the life of cyanazine beyond 2002 and reinstate useful rates for weed control, Griffin submitted a full set of new cyanazine registrations to the EPA in April 1996 which did not agree to the DuPont phase-out. In the months following Griffin's new submissions, a significant event unfolded which dramatically impacted cyanazine and the other triazines under special review. HR 1627, the Food Quality Protection Act (FQPA), was passed by Congress which implemented new procedures for tolerance review by the EPA. Until the new guidelines are written and enacted, there will be no progress on cyanazine or the other triazines under review. To compound the uncertainty associated with cyanazine, in August the EPA ruled that Griffin's resubmitted cyanazine technical registration was not "substantially similar" although the February 1995 technical registration proceeded through review. This EPA denial left Griffin no alternative but to continue with the phase-out language on their labels in order to remain in the cyanazine market. Fortunately, we believe there is still a future for cyanazine with support from University scientists and producers. Griffin Corporation is committed to the defense of cyanazine and will reevaluate how best to proceed when the Triazine Special Review is concluded.