

# Imprelis: What went wrong?

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## What is Imprelis?

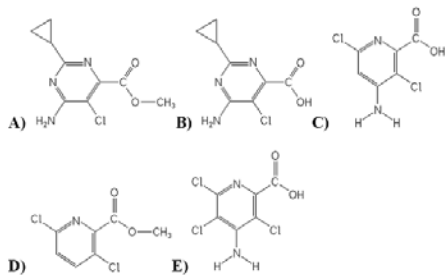
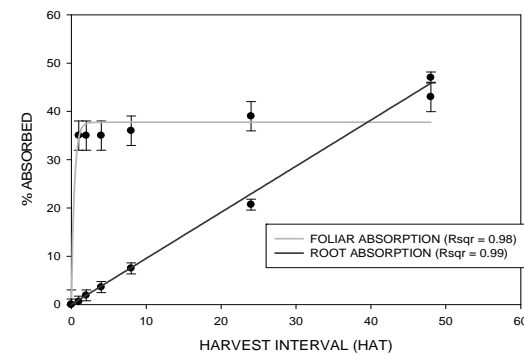


Figure 1.1 Chemical structures of A) aminocyclopyrachlor, B) aminocyclopyrachlor methyl ester, C) aminopyralid, D) clopyralid, and E) picloram.

## Root versus foliar uptake of Imprelis in pine seedlings



Source: Roten 2011

## Why use Imprelis?



From: Jan Byrne <byrnejm@msu.edu>  
To: Bert Cregg <cregg@msu.edu> Subject: Norway Spruce images  
Date: June 14, 2011

Bert,

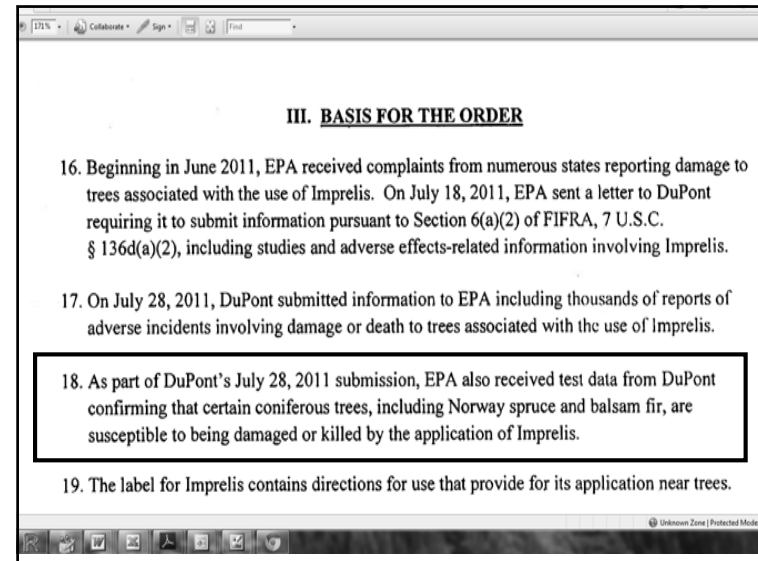
The attached pictures are from a client that I spoke to on the phone. These symptoms are pretty severe and I am not sure what to attribute them to. I originally questioned herbicides, but none have been applied to the lawn. Could last week's rapid change from cool to hot temperatures have something to do with it?

Jan



## Initial DuPont info on Imprelis

- A majority of the reports involve Norway Spruce or White Pine.
- In most cases, Imprelis was not applied alone, but in a mixture with other herbicides, either pre-emergent, postemergent and/or with a liquid fertilizer.
- Some reports indicate there may have been errors in use rates, mixing practices and/or applications to exposed roots, or the tree.
- Most golf course superintendents have used Imprelis to successfully control weeds and have not reported unfavorable tree symptoms.



III. BASIS FOR THE ORDER

16. Beginning in June 2011, EPA received complaints from numerous states reporting damage to trees associated with the use of Imprelis. On July 18, 2011, EPA sent a letter to DuPont requiring it to submit information pursuant to Section 6(a)(2) of FIFRA, 7 U.S.C. § 136d(a)(2), including studies and adverse effects-related information involving Imprelis.

17. On July 28, 2011, DuPont submitted information to EPA including thousands of reports of adverse incidents involving damage or death to trees associated with the use of Imprelis.

18. As part of DuPont's July 28, 2011 submission, EPA also received test data from DuPont confirming that certain coniferous trees, including Norway spruce and balsam fir, are susceptible to being damaged or killed by the application of Imprelis.

19. The label for Imprelis contains directions for use that provide for its application near trees.

## So, what went wrong?

### **Testing prior to registration was inadequate**

- Imprelis clearly had much more devastating impacts on trees, especially conifers, than DuPont or EPA realized

## What did DuPont know and when did they know it?

- DuPont had test data that indicated Imprelis could damage conifers – this was the basis for the EPA Stop Sale Order
- Why did they ignore or cover this up?



## What did EPA know and when did they know it?

- The test data used as the basis for the Stop Sale Order should have been sufficient to prevent or restrict registration
- Did they ignore the data or was it never presented prior to registration?



## What's next?

- Will damaged trees recover?
- What can/should be done with damaged trees?
- What about 'cures'?
- When is it safe to replant?

## What to do with Imprelis-affected trees\*



\* If participating in DuPont claims process, instructions from DuPont supersede everything

## Imprelis vs other spruce problems