

United States Department of Agriculture
Agricultural Marketing Service | National Organic Program
Document Cover Sheet

<https://www.ams.usda.gov/rules-regulations/organic/petitioned-substances>

Document Type:

National List Petition or Petition Update

A petition is a request to amend the USDA National Organic Program's National List of Allowed and Prohibited Substances (National List).

Any person may submit a petition to have a substance evaluated by the National Organic Standards Board (7 CFR 205.607(a)).

Guidelines for submitting a petition are available in the NOP Handbook as NOP 3011, National List Petition Guidelines.

Petitions are posted for the public on the NOP website for Petitioned Substances.

Technical Report

A technical report is developed in response to a petition to amend the National List. Reports are also developed to assist in the review of substances that are already on the National List.

Technical reports are completed by third-party contractors and are available to the public on the NOP website for Petitioned Substances.

Contractor names and dates completed are available in the report.

Pear Ester

Crops

Identification of Petitioned Substance

1		
2		17
3	Chemical Names:	18 Cidetrak® CMDA Combo (EPA Reg. No. 51934-
4	2,4-decadienoic acid, ethyl ester, (E,Z)	19 16)
5	ethyl-(2E,4Z)-decadienoate	20 Cidetrak® CMDA + LR (EPA Reg. No 51934-18)
6	ethyl-2E,4Z-decadienoate	21 Cidetrak® CMDA + OFM Meso (EPA Reg. No.
7	ethyl-(E,Z)-2,4-decadienoate	22 51934-21)
8	ethyl trans-2, cis-4-decadienoate	23
9		24 CAS Numbers:
10	Other Names:	25 3025-30-7
11	pear ester	26
12		27 Other Codes:
13	Trade Names:	28 FEMA No. 3148
14	Cidetrak® DA MEC™ (EPA Reg. No. 51934-12)	29 BRI Product Code 433
15	Cidetrak® CMDA 90/60 (EPA Reg. No. 51934-	30 OPP Code 144022
16	13)	31
32		

Summary of Petitioned Use

34
35 This full scope technical report provides information to the National Organic Standards Board (NOSB) in
36 support of its review of pear ester. In September 2023, Trécé, Inc. submitted a petition for 2,4-decadienoic
37 acid, ethyl ester, (E,Z), also known as pear ester, to be included as a crop pesticide material on the National
38 List of Allowed and Prohibited Substances (hereafter referred to as “The National List”) (Trécé, Inc., 2023).
39 The petitioner requested that pear ester be included at 7 CFR 205.601 as a synthetic substance for use in
40 monitoring, mating disruption, and [pest] control products.
41
42 While pheromones are listed at § 205.601(f) for insect management, pear ester acts as a kairomone (Trécé,
43 Inc., 2023). Pheromones are chemical signals produced by plants or other organisms that are detected by
44 members of the same species, whereas kairomones are chemical signals produced by plants or other
45 organisms that are detected by a different species, often insects. Detection of kairomones produced by a
46 plant leads to a fitness benefit for insects, such as avoiding a predator or finding a suitable host plant.
47 According to the petitioner, synthetic pear esters are identical to the naturally occurring kairomones
48 produced by pears and other fruit. The petitioner states that pear ester attracts codling moths to monitoring
49 traps, helping pest control advisors track them. In turn, this information is used to help crop producers
50 apply pesticides at the right time. Also, pear ester can be used to enhance the effect of other pheromones
51 used in mating disruption controls (Trécé, Inc., 2023).
52

Characterization of Petitioned Substance

Composition of the Substance:

Pear ester (CAS No. 3025-30-7) is the ethyl ester of 2E,4Z-decadienoic acid (see [Figure 1](#), below).

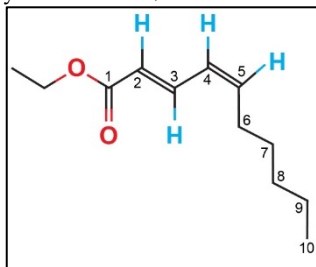


Figure 1: Chemical structure of pear ester. By convention, the carbon joining the two oxygen atoms (part of the carboxylic-ethyl ester acid group) is carbon number one. There is a double bond between carbons 2 and 3, and between carbons 4 and 5. When priority groups are on the same side, it is called cis-, or Z for Zusammen. The double bonds force the molecule into a planar configuration near those bonds.

Pear ester has moderate chemical stability, but the double bonds between carbon atoms are vulnerable to oxidation and photodegradation. Acids or bases can hydrolyze the ethyl ester, releasing ethanol and 2E, 4Z-decadienoic acid to the environment (US EPA, 2013).

Source or Origin of the Substance:

Pear ester was first isolated from ripe Bartlett pears (Jennings et al., 1964). The original experiments that identified pear ester as a kairomone used pear extracts (Light et al., 2001). Commercial pear essence contains about one-third pear ester by weight (Tucker et al., 2003). Pear ester used in commercial pest control formulations is produced by chemical synthesis (Light et al., 2017; Trécé, Inc., 2023; Tsubi et al., 1993). (Kairomone is defined in [Action of the Substance](#).)

Properties of the Substance:

Pear ester is a colorless to slightly yellow liquid at room temperature and normal atmospheric pressure. It has the odor of ripe Bartlett pears. It has a high boiling point and a low melting point, and thus maintains its liquid form under extreme environmental conditions. It has a low solubility in water and is less dense than water (US EPA, 2013).

The octanol/water partition coefficient is about 4.4, and pear ester is about 10,000 times more soluble in octanol than in water (US EPA, 2013).¹ The high solubility of pear ester in lipid-like substances allows it to penetrate codling moth receptor structures with ease.

The vapor pressure of the pure substance is low, but because it has a relatively large Henry's constant, 7.54×10^{-4} atm-m³/mol, it has a moderate volatility from sprays.² A saturated solution of pear ester in water at 25° C has a volatility near that of water. Because of its volatility, pear ester dissipates quickly in the environment. Manufacturers encapsulate volatile components of spray formulations to limit volatilization and produce products that have a lasting effect (US EPA, 2013).

Pear ester has a vapor density 6.8 times that of air. That means that when dispensers or sprays are added to tree canopies, pear ester vapors drift downward toward the base of the tree (Boudakian Research, 2023; US EPA, 2013).

¹ When a test substance is added to a mixture of octanol and water, some dissolves in octanol and the rest dissolves in water. The ratio of the concentration in octanol to the concentration in water is the partition coefficient, Kow. It is usually reported as a logarithm, logKow.

² In other words, pear ester evaporates more readily in field conditions than its vapor pressure alone would indicate.

94

Table 1: Properties of pear ester

Property	Value ^a
Physical state and appearance	Liquid at 25 °C
Odor	Odor of Bartlett pears
Taste	Not available
Color	Colorless to slight yellow
Molecular weight	196.28 g/mole
Specific gravity	0.905
pH	Not available
Solubility	8.588 mg/liter at 25 °C
pKa	Not available
pKb	Not available
Boiling point	248.8 °C (SDS); 258.4 °C (EPA)
Melting point	-60.3 °C
Critical temperature	Not available
Vapor pressure	0.0173 mm Hg at 25° C
Stability	Stable under normal conditions
Reactivity	Reacts with oxidizing agents, acids, and bases
Vapor density	6.8 times that of air
Partition coefficient octanol/ water	4.36
Volatility from saturated solution in water	23.8 mm Hg at 25°C

95 Source: (Boudakian Research, 2023; US EPA, 2013)

96 **Specific Uses of the Substance:**

97 Pear ester is used in the control of insect pests, namely the codling moth, *Cydia pomonella* – an economically
98 significant pest that principally affects apple, pear, and walnut crops (Trécé, Inc., 2023).

100 The codling moth has four life stages: adults, eggs, larvae, and pupae. The life cycle is synchronized with
101 the weather by larval diapause, a form of hibernation. Larvae go into diapause in August and overwinter
102 in this form. In late winter, they pupate, and emerge as adults in the early spring (Quarles, 1997; Steiner,
103 1940; Van Leeuwen, 1940; Witzgall et al., 2008).

105 Within a week after emergence from pupae as adults, mating is complete. Females lay up to 100-130 eggs,
106 as isolated eggs, never as clusters, near developing fruit. Most of the reproductive activity associated with
107 this first flight of adults is over by the end of April. There are a total of three flights each year in most areas
108 (Quarles, 1997; Steiner, 1940; Van Leeuwen, 1940; Witzgall et al., 2008).

109 The larvae damage fruit by chewing their way inside. Once inside, the fruit is unmarketable (Caprile &
110 Vossen, 2011).

111 *Pear Ester and Monitoring/Timing*

112 Pear ester can be used as a lure in traps to monitor populations of codling moth in orchards (Light et al.,
113 2001). Successful monitoring can then be used to determine the timing and set action thresholds for
114 treatments (Knight & Light, 2005).

115 Farmers and pest control professionals hang monitoring traps in orchards each year before mating
116 populations of the codling moth emerge from their pupae in March (University of California Statewide
117 IPM Program, 2015). The date of the first appearance of a codling moth in a monitoring trap is called the
118 “biofix point.” In California apple orchards, adults start to fly mid-March to early April, and the biofix
119 point is during this time (trees bloom mid-April to mid-May) (University of California Statewide IPM
120 Program, 2015).

121 Monitoring traps are baited with pheromones or pheromone-pear ester combinations. Combining
122 pheromones with pear ester increases the number of male insects that are attracted to the trap (Joshi et al.,
123 2011) (see [Focus Question #1](#)).

130 The biofix point is used to time insecticide applications or the start of pheromone mating disruption
131 treatments. Approximately one month after the biofix point, insecticide sprays are applied to kill hatching
132 larvae. The exact time for insecticide application is determined by measuring daily temperatures (Caprile &
133 Vossen, 2011). [Evaluation Question #11](#) describes this timing in more detail.

134
135 Mating disruption programs must be started no later than the biofix point. Once mating disruption has
136 started, monitoring traps with pheromone lures are no longer useful. At this point, the air is saturated with
137 pheromones, and moths cannot find the traps. In contrast to pheromone traps, monitoring traps containing
138 kairomones such as pear ester make it possible for farmers and pest control professionals to check the
139 effectiveness of mating disruption (Knight, 2010; Knight et al., 2014, 2019; Trécé, Inc., 2023).

140
141 In California, the first flight of the codling moth is complete and the first generation of eggs laid by the time
142 apple trees flower in April and May. Because the codling moth has two to three more mating flights in a
143 season, further treatment may be needed. According to Integrated Pest Management experts, traps
144 containing pear ester, and perhaps other kairomones, are essential to determine when to apply treatments
145 (Caprile & Vossen, 2011; University of California Statewide IPM Program, 2015).

146
147 Traps baited with pear ester lures can also be used for mass trapping, to remove egg-laying females from
148 orchards (Knight et al., 2022).

149 *Pear Ester and Mating Disruption*

150
151 Pear ester is also used as part of codling moth mating disruption treatments. Although pheromones alone
152 are used, pheromones combined with a simultaneous release of pear ester may be more effective (Light et
153 al., 2017) (see also [Focus Question #1](#)). These mating disruption treatments can be applied in two ways: via
154 plastic dispensers or as microencapsulated cover sprays (University of California Statewide IPM Program,
155 2015). PVC dispensers have two reservoirs, one for the codling moth sex pheromone codlemone, (E, E)-
156 8,10-dodecadien-1-ol (CAS No. 33956-49-9), and one for pear ester. Both materials passively diffuse from
157 the dispensers into the air. There are standard dispensers and larger, “meso” dispensers that hold more
158 active ingredient (Trécé, Inc., 2023).

159
160 Commercial formulations are described in [Combinations of the Substance](#). Emission characteristics of pear
161 ester from these dispensers are discussed below. Mating disruption dispensers loaded both with codling
162 moth sex pheromone and pear ester can be more effective for mating disruption than dispensers with
163 pheromone alone (Light et al., 2017) (see [Focus Question #1](#)).

164
165 Microencapsulated sprays of pear ester can also improve the effectiveness of mating disruption, can make
166 some insecticides more effective (Light et al., 2017), and can even prevent fruit damage as a standalone
167 spray (Kovanci, 2015). The commercial spray, DA MEC™, is a concentrated aqueous solution containing
168 5% microencapsulated pear ester (50 mg pear ester/ml) with 95% water and other inerts. Pure pear ester is
169 encapsulated inside tiny, rigid, spherical, semipermeable plastic capsules of polyamide (Dietrich et al.,
170 1989; Light & Beck, 2010). Their particle size ranges from 2 to 14 µm, but 68% of the capsules are less than 3
171 µm in diameter. The capsules are then added to an aqueous solution of coformulants and inerts to produce
172 a final concentration of 5% pear ester (Cidetrak, 2020; Light & Beck, 2010).

173
174 DA MEC™ is usually applied at the rate of 12 ml/acre or 30 ml/ha. It is diluted in 100 gallons of water per
175 acre before spraying (1 to 32,000 dilution). About 600 mg microencapsulated pear ester is applied per acre,
176 or 1.5 g/ha. Air blast sprayers are used to spray tree canopies, and the diluted spray contains about 259,000
177 particles microencapsulated pear ester per ml. Though the usual spray is 12 ml DA MEC™/acre, the label
178 allows single applications up to 70 ml/acre (3.5 g pear ester/acre). Repeated applications are limited to
179 12 ml, and the maximum allowed is 96 ml/acre/year (4.8 g pear ester/acre/year) (Cidetrak, 2020; Light &
180 Beck, 2010).

181

182 For combined treatments, DA MEC™ is tank mixed with an insecticide or with a sprayable
183 microencapsulated codlemone formulation (Cidetrak, 2020; Light & Beck, 2010).³

184
185 Emission characteristics of pear ester from dispensers and microencapsulated sprays are discussed below.

186
187 *Emission Rates from Dispensers*

188 The natural pear ester release rate from maturing Bartlett pears in an orchard is 3.7 g/acre/month (Trécé,
189 Inc., 2023). An average month is about 30 days, so a pear orchard releases about 0.12 g/acre/day or about
190 120 mg/acre/day.

191
192 Release rates of pear ester from dispensers vary with temperature. Also, the amounts released are
193 proportional to concentration, and emission rates drop with time. A standard formulation is Cidetrak
194 CMDA 90/60 meso dispensers. For apples, these dispensers contain 900 mg codlemone and 600 mg of pear
195 ester. For walnuts they contain 1440 mg codlemone and 960 mg of pear ester (Cidetrak, 2014).

196
197 Knight & Light (2014) measured the emission rates from these meso dispensers in apple orchards in 2011
198 and again in 2012. When averaged over the two-year period, emission rates for the first 74 days averaged
199 4.07 mg/day/dispenser. Those left for an additional 69 days lost an average 2.28 mg/day/dispenser
200 (Knight & Light, 2014). Dispensers were in the field for an average of 143 days. Based on these averages we
201 calculated the following emission rates that appear in [Table 2](#), using the meso dispenser formulation and set
202 up described by Cidetrak (2014).

203
204

Table 2: Approximate emission rates from pear ester dispensers

Application Parameters	Apples and pears	Walnut ^c
Maximum Meso Dispensers Set Up per Acre ^a	40	32
Dispenser pear ester Content ^a	600 mg	960 mg
Average Emission Rate: Day 1-74	4.07 mg/day/dispenser ^b	6.5 mg/day/dispenser
Calculated Maximum Average Emission Rate: Day 1-74	163 mg/acre/day	208 mg/acre/day
Average Emission Rate: Day 75-143	2.28 mg/day/dispenser ^b	3.65 mg/day/dispenser
Calculated Maximum Average Emission Rate: Day 75-143	91 mg/acre/day	117 mg/acre/day
Average Emission Rate: Overall 143 Day Treatment	127 mg/acre/day	162 mg/acre/day

205 ^a As described by (Cidetrak, 2014).

206 ^b Knight & Light (2014) measured the emission rates from these meso dispensers in apple orchards in 2011 and again in 2012.
207 Calculations are averaged from data collected during the two experiment years.

208 ^c The numbers cited by Knight et al. (2014), 4.07 mg/day/dispenser (74 days) and 2.28 mg/day/dispenser (69 days) were for apple
209 dispensers containing 600 mg pear ester. The theoretical calculations indicated here use the walnut dispenser formulation and assume
210 emissions in walnut are proportional to those in apple.

211
212 In summary, maximum average emissions (74 days) in apple are 163 mg/acre/day and maximum average
213 emissions (74 days) in walnuts are 208 mg/acre/day. Maximum average emissions in apple are 35.8%
214 higher than natural pear orchards (120 mg/acre/day) and maximum average emissions in walnut are
215 73.3% higher.

216
217 The figures above are for one application of the dispensers. The label allows more than one application a
218 year up to a maximum of 100 dispensers/acre/year for apple. That is an annual maximum of 60
219 grams/acre/year for pear ester and 90 grams/acre/year for codlemone, the sex pheromone. For walnuts, a
220 maximum of about 62 dispensers/acre are allowed. Since pear ester emissions are degraded quickly and
221 do not bioaccumulate, the exposure figures for one application of dispensers are a reasonable estimate of
222 exposure (Cidetrak, 2014; US EPA, 2013).

223
224 *Potency of Emissions*

225 Pear ester is an extremely potent codling moth disruptant. It compares favorably with the codling moth sex
226 pheromone, codlemone. The airborne concentration of codlemone needed to produce mating disruption in

³ Sex pheromone of the codling moth.

227 apple orchards is 10 mg/ha/hr. or about 4.0 mg/acre/hr. (Howell et al., 1992). The average minimum
 228 amount of pear ester needed for behavioral disruption in an apple orchard was calculated above as
 229 3.7 mg/acre/hr. These are the emissions from dispensers late in the season when concentrations in the
 230 dispenser are lower (Knight & Light, 2014).

231
 232 *Emission Rates from Sprays*

233 Light & Beck (2010) measured neonate response to field application rates of DA MEC™ (1/32,000 dilution)
 234 in the laboratory. Assays during the first 14 days after the emergence of codling moth larvae showed that
 235 larvae spent more time in treated areas than on water controls. After 20 days, there was no significant
 236 difference in time spent. Based on this information, sprays are likely effective for 14 days.

237
 238 Label spray rates of DA MEC™ are usually 600 mg pear ester/acre (Light & Beck, 2010). If sprays are
 239 effective for 14 days, average exposure over this time would be 42.8 mg pear ester/acre/day. A more
 240 accurate assessment involves measuring volatilization rates. Light & Beck (2010) measured emission rates
 241 of diluted DA MEC™ in the laboratory. They found that rates followed first order kinetics, where emission
 242 rates are proportional to amounts, which are higher at first, then decay exponentially with time.

243
 244 The emissions from field application rates (1/32,000 dilution) were too small to be measured accurately.
 245 Light & Beck (2010) approximated field emission rates with two dilutions: 1/1000 and 1/3200. An
 246 exponential fit to the 1/3200 dilution is expected for first order kinetics, gives a good correlation with the
 247 data, and is used to calculate the estimates in [Table 3](#). Light & Beck (2010) also used a power decay model
 248 with a higher correlation, but similar results.

249
 250

Table 3: Approximate emission rates from pear ester sprays

Application rate	Emission rate	Equivalency compared to pear ester emissions from a pear orchard
Minimum label application (12 ml/acre)	Maximum 1-day Emission rate 86.4 mg/acre/day ^b	72%
Maximum label application (70 ml/acre)	250 mg/acre/day, Average Daily Emission for 14 days	208%
Maximum label application (70 ml/acre) ^d	504 mg/acre/day, Maximum 1-day Emission rate	400%

251 ^a Equivalencies are evaluated in comparison to the natural emissions rate of pear ester from pear orchards, 120 mg/acre/day (Trécé,
 252 Inc., 2023).

253 ^b Based on the work of Light & Beck (2010) the initial emission rate was 166.16 picograms per hour (pg./hr.). After 24 hrs., the rate is
 254 142.1 pg./hr. The percent reduction is 14.4%. Emission rate is proportional to amount, and DA MEC™ field sprays contain 600 mg
 255 pear ester/acre. Therefore, 14.4% or 86.4 mg/acre volatilizes in 24 hours. The maximum exposure from these sprays is
 256 86.4 mg/acre/day.

257 ^c After two weeks, 88.8% of the pear ester from the sprays is gone. Because of the relatively quick depletion, the label allows sprays
 258 every two weeks. The exposure, if all the spray volatilizes over the course of two weeks, is 42.8 mg/acre/day.

259 ^d The maximum 70 ml application can only be used once a year (Cidetrak, 2020).

260
 261 The worst-case scenarios for the usual application, 86.4 mg pear ester/acre/day for maximum exposure,
 262 and 42.8 mg pear ester/acre/day for average exposure, will be used throughout this document (Kovanci,
 263 2015; Light & Beck, 2010; Trécé, Inc., 2023). The greatest exposure possible is not from dispensers, but from
 264 maximum label use of DA MEC™ spray: 504 mg/acre/day, maximum one-day exposure, and 250
 265 mg/acre/day, the maximum average over two weeks (Cidetrak, 2020; Light & Beck, 2010).

266
 267 **Approved Legal Uses of the Substance:**

268 Pear ester appears on the FDA list of Substances Added to Food (*formerly EAFUS*) for use as a flavoring
 269 agent or adjuvant food additive (US FDA, 2024).

270
 271 The EPA has registered pear ester formulations as pest control products (see [Combinations of the Substance](#)
 272 for a list of registered products). The EPA has also determined that, because of low toxicity, pear ester is
 273 exempt from the requirement of a tolerance for residues in or on food crops at 40 CFR 180.1323.

274

Action of the Substance:

Pear ester can (Hughes et al., 2003; Light et al., 2001; Light & Beck, 2012):

- improve codling moth monitoring.
- enhance mating disruption.
- disrupt egg laying.
- confuse larvae, making it harder for them to find, infest, and damage fruit.

Pear ester is a type of semiochemical called a kairomone. Semiochemicals are bioactive molecules released by an organism to signal or provoke a behavioral or physiological response (Klassen et al., 2023). Signaling may be between members of the same species or between two or more different species. Pheromones are released for communication between members of the same species. Kairomones convey communication signals between two or more different species (Klassen et al., 2023).

Adult males, adult females, and larvae have receptors for pear ester and separate receptors for the codling moth pheromone, codlemone (Ansebo et al., 2004; Light et al., 2017). When both types of receptors are activated, neural integration occurs in the moth brain.⁴ Behavioral priority is given to this kind of signal, making combinations of pear ester and pheromones powerful drivers of codling moth behavior (Ansebo et al., 2004; Light et al., 2017). Pear ester can be detected in extremely small quantities by both adult male and female codling moths and larvae (Light et al., 2001). For instance, electroantennogram tests show detection at 7.9 nanograms (Light et al., 2001).⁵

Monitoring Traps

Codling moths are attracted in the field by traps baited with one microgram of pear ester. This amount is also the threshold detection dose for codlemone. High potency and field stability make pear ester valuable for pest management (Light et al., 2001).

As a kairomone and not a sex pheromone, pear ester lures both male and female codling moths, and both mated and unmated females. Because of this, traps baited with pear ester can capture both males and females (including mated and unmated moths). Since egg-laying females are attracted, monitoring traps can be used to more effectively establish action thresholds for Integrated Pest Management treatments (Knight & Light, 2005).

Pear ester traps do have limitations. They are most effective in walnut orchards, about half as effective in apple orchards, and not very effective in pear orchards (Light et al., 2001). In pear orchards, traps are overwhelmed with plant volatiles from the ripening crops. The disadvantage can be overcome by using lures with larger amounts of pear ester or by the addition of other kairomones (Knight et al., 2019).

Farmers and pest control professionals usually monitor codling moths using sex pheromone (like codlemone) lures, but the sex pheromone only attracts males (Light et al., 2001). Where mating disruption products are used, air saturation with pheromone makes it difficult for male codling moths to find the monitoring trap. In situations like this, pear ester is especially useful for monitoring codling moths (Light et al., 2001).

Combination Lures in Monitoring Traps

Knight et al. (2005) combined pear ester with codlemone to monitor codling moth in apples. Knight & Light (2005) used combinations of pear ester and codlemone to develop action thresholds for codling moth mating disruption treatments in apple orchards.

⁴ Neural integration refers to a process by which neurons process different stimuli. Integration can lead to an increased or decreased probability that a neuron will fire.

⁵ Insect antennae have chemical receptors. When a receptor is activated, an electrical nerve response is generated that can be amplified and measured.

323 Later experiments showed that monitoring with pear ester and codlemone combinations could be
324 improved by the addition of acetic acid (Knight, 2010). Trials of added acetic acid and a number of other
325 kairomones, such as farnesene, showed that lures could be formulated to attract other moth pests, such as:
326

- oriental fruit moth, *Grapholita molesta*
- 327 • the leafroller, *Pandemis pyrusana*
- 328 • obliquebanded leafroller, *Choristoneura rosaceana*
- 329 • eyespotted budmoth, *Spilonota ocellana*

330
331 Traps baited with pear ester, codlemone, and glacial acetic acid were effective for monitoring codling moth
332 and the other leafroller species (Knight et al., 2014) (see [Focus Question #1](#)).

333
334 The addition of various volatile terpenoids to lures containing pear ester and acetic acid, but no sex
335 pheromones, enhanced the capture of female codling moths by about three-fold (Knight et al., 2019).

336
337 Knight et al. (2014) monitored pome and stone fruit orchards for codling moth and oriental fruit moth
338 populations simultaneously using lures that contained pear ester, other kairomones, glacial acetic acid,
339 codlemone, and the oriental fruit moth sex pheromone. In another study, Knight et al. (2023) added LED
340 lights to previous pear ester monitoring combinations to increase the number of codling moths captured.

341
342 *Monitoring to Determine Effectiveness of Mating Disruption*

343 When used in combination with codlemone in mating disruption dispensers, or in microencapsulated
344 sprays, pear ester can enhance the effectiveness of mating disruption (Light et al., 2017). There are several
345 measures of effectiveness. Monitoring traps baited with codlemone pheromone are used most often. The
346 fewer moths trapped, the more effective the disruption. High levels of the mating disruption pheromone
347 make it difficult for males to locate the traps, resulting in trap shutdown. Monitoring traps baited with
348 tethered females are also used (Stelinski et al., 2013).

349
350 A more conclusive result is achieved by using monitoring traps baited with pear ester to catch females. The
351 fewer mated females caught, the more effective the mating disruption (Knight, 2006). A practical measure
352 is the amount of fruit damage. The less damage, the more effective the mating disruption. Of all the
353 possible measurements of effectiveness, the easiest is trap shutdown, and the most important, from a
354 grower standpoint, is the amount of fruit damage (Kovanci, 2015).

355
356 *Limitations of Mating Disruption*

357 Female moths release a sexual pheromone into the air (Witzgall et al., 2008). As the pheromone plume
358 drifts over an orchard, males sense it and fly toward the female. Mating disruption treatments release
359 relatively large amounts of pheromone, making it harder for males to find females. Large initial
360 populations can work against mating disruption treatments. When populations are large, males can find
361 females with visual cues. Farmers and pest control professionals sometimes use an insecticide treatment
362 before starting a mating disruption program (Witzgall et al., 2008).

363
364 Immigration of already mated females from a nearby orchard can also overcome mating disruption
365 treatments. If possible, the nearest orchard should be more than 400 m away. Border sprays of insecticides
366 are sometimes used to limit immigration (Rothschild, 1982).

367
368 Sex pheromone treatments need to have uniform concentration throughout an orchard. If there are dead
369 spots in the distribution, mating can occur in that area. There can also be problems with patchy codling
370 moth distribution. Females prefer to lay eggs on trees that have the most fruit. When larvae pupate, males
371 are already in the area waiting for females to emerge (Light et al., 2017; Witzgall et al., 2008).

372
373 Mating disruption is not mating prevention. According to Light et al. (2017), experiments have shown
374 untreated apple orchards have 73-90% mated females, and orchards utilizing conventional pest controls
375 have >77% mated females. When mating disruption treatments use pheromone only, 58-85% of females are
376 mated, whereas mating disruption with combined pheromone and pear ester results in 64-71% mated
377 females (Light et al., 2017) (see [Combinations of the Substance](#)).

378
379 To protect against fruit damage, it is not necessary to completely disrupt all mating (Jones et al., 2008). Just
380 a delay in mating can reduce pest populations and damage. When female mating is delayed more than two
381 days, there is a reduction in population density because the female is older and lays fewer eggs. Fewer eggs
382 results in less fruit damage (Jones et al., 2008). Witzgall et al. (2008) report damage levels of 0.03 to 0.8% for
383 California apple orchards using area-wide pheromone mating disruption.

384
385 Pear ester is a useful addition to Integrated Pest Management programs because it gives another layer of
386 protection. If moths successfully mate and start laying eggs, pear ester confuses females that prefer to lay
387 eggs near ripening fruit. Misplaced eggs lead to less fruit damage (Hughes et al., 2003). If eggs successfully
388 hatch, larvae are also confused by pear ester and have trouble finding their way to fruit (Light & Beck,
389 2012).

390 391 *Mating Disruption Dispensers*

392 Pear ester has been combined with codlemone in mating disruption dispensers. At high doses of all
393 substances, the combination is more effective than codlemone alone (Knight, Light, et al., 2012). Initial
394 experiments using this combination, with codlemone concentrations near those of commercial products
395 such as Isomate or Checkmate, often outperformed the commercial products. For instance, when codling
396 moth activity was monitored with female-baited traps, combo dispensers containing 45 mg codlemone and
397 110 mg pear ester, or 45/75 or 75/45 ratios, were more effective for mating disruption in several cases than
398 Isomate-C Plus containing 96.5 mg codlemone (Knight, Light, et al., 2012).

399 400 *Mating Disruption Sprays*

401 Pear ester microencapsulated formulations (DA MEC™) have been mixed with sprayable
402 microencapsulated versions of codlemone. Kovanci (2015) compared DA MEC™ sprays with these
403 pheromone sprays (PH MEC), or the two combined (combo) in apple orchards under high codling moth
404 pressure. Late season fruit damage in untreated orchards was 25-36%. Each treatment was applied four
405 times during the season. Sprays used 5 g DA MEC™ and 25 g PH MEC per hectare. Combo sprays were
406 applied both in the label amount of water (635 liters/ha), and in Ultra Low Volume (ULV) (40 liters/ha).

407
408 Combined sprays were more effective in producing mating disruption than either pear ester or codlemone
409 alone. Traps were baited with lures containing 3 mg pear ester, 3 mg of codlemone, or a combo of both, and
410 were monitored weekly. DA MEC™ reduced trap captures 43%, PH MEC had a 61% reduction, and the
411 combo had an 85% reduction, indicating that the combo yields the most effective mating disruption.

412
413 In the same study (Kovanci, 2015), more mated females (70%) were trapped with DA MEC™ than with
414 PH MEC (57.5%) or the combo (68.8%), but the differences were not statistically significant. Late season
415 pre-harvest fruit damage was reduced 54% by DA MEC™ alone, but reduction with PH MEC or the combo
416 was 72%. Live larvae were reduced 65% by DA MEC™, 84% by PH MEC, and 85% by the combo. The
417 combo was no more effective than sex pheromone alone (PH MEC) in reducing fruit damage. These figures
418 are for the normal, high-volume spray. Fruit damage was reduced 93% by ULV combo sprays. Combo
419 sprays were more effective than sex pheromone alone in reducing fruit damage only with ULV
420 applications (Kovanci, 2015).

421 422 *Insecticidal Sprays*

423 DA MEC™ has also been tank-mixed with insecticides. Knight & Light (2013) tested microencapsulated
424 pear ester sprays, later registered as DA MEC™, mixed with sprayable insecticides in apples. The
425 sprayable pear ester improved efficacy of insecticides, such as phosmet, that work by contact with toxic
426 residues. In apple orchards, combinations of pear ester and spinosad had 35.5% less damage than spinosad
427 alone. Addition of pear ester to organophosphates and neonicotinoids led to a further reduction in damage
428 of more than 50% (Knight & Light, 2013). Effects were lowered with insecticides that work through
429 ingestion. Codling moth granulosis virus, which must be ingested, was not more effective at reducing
430 damage to apple crops when combined with pear ester (Arthurs et al., 2007).

431

432 Combined sprays have shown to be more effective in walnuts (Light & Knight, 2011) than in apple or pear
 433 orchards (Knight & Light, 2013). In one study, pear ester sprays did increase the effectiveness of codling
 434 moth granulosis virus in walnuts (Light & Knight, 2011), but had little effect in apple or pear (Arthurs et
 435 al., 2007). Pear ester combinations with organophosphates or Insect Growth Regulators (IGRs) were also
 436 more effective in walnuts (Knight & Light, 2013).

437
 438 Light & Knight, (2011) tested combinations of insecticides and pear ester sprays in walnut orchards. Sprays
 439 of 1.8 g pear ester/ha led to a significant reduction in codling moth kernel damage when compared to
 440 insecticide sprays alone. The additional reductions were 83% for chlorpyrifos, 76% for phosmet, 49% for
 441 methoxyfenozide, and 39% for codling moth granulosis virus. Significant reductions in kernel damage
 442 from the navel orangeworm were also seen with the combinations.

443 444 *Action of Microencapsulated Sprays*

445 Codling moth life stages are adults, eggs, larvae, and pupae. Codling moth larvae are the actual orchard
 446 pests. After hatching, they immediately try to find fruit, chewing their way inside – the proverbial worm in
 447 the apple (Light et al., 2001). Sprays of microencapsulated pear ester cause first instar larvae to spend more
 448 time walking around on leaves.⁶ Due to this, they are less able to find fruit to infest (Hughes et al., 2003;
 449 Light & Beck, 2012).

450
 451 Application of microencapsulated pear ester sprays alone can reduce fruit damage and increase larval
 452 mortality in apple and pear (Kovanci, 2015). No significant effect on kernel damage was found in walnut
 453 orchards with label rate applications of microencapsulated pear ester alone (Light & Beck, 2012; Light &
 454 Knight, 2011). But mixtures with insecticides were more effective in walnut (Light & Knight, 2011) than in
 455 apple (Knight & Light, 2013).

456
 457 Pear ester treatments can also disrupt egg laying. Codling moths normally lay single eggs on leaves within
 458 20 cm of developing fruit (Light & Beck, 2012). Pear ester treatments cause codling moths to lay eggs
 459 further away from fruit (Hughes et al., 2003).

460 461 **Combinations of the Substance:**

462 463 *Combinations in Commercial Products*

464 Pear ester dispensers contain coformulants such as pheromones and UV inhibitors in addition to the
 465 kairomone (see [Table 4](#) and [Focus Question #1](#) for further discussion). However, most inert ingredients in
 466 commercial pear ester products are not publicly disclosed.

467
 468 **Table 4: Commercial products containing pear ester (National Pesticide Information Center, 2024; Trécé, Inc., 2023)**

Name	EPA Reg No.	Pear ester	Other pheromones?	Form	Target pests
Cidetrak® DA MEC™	51934-12	5%	-	Micro-encapsulated. May be further mixed with other pheromones and insecticides.	Codling moth, hickory shuckworm
Cidetrak CMDA 90/60	51934-13	1.2%	1.8% codling moth pheromone	Dispenser	Codling moth, walnut shuckworm
Cidetrak CMDA Combo	51934-16	1%	1.7% codling moth pheromone	Dispenser	Codling moth, hickory shuckworm
Cidetrak CMDA + LR	51934-18	1%	Dual dispenser: 1.7% codling moth pheromone (disp. 1); 4.3% leafroller pheromone (disp. 2)	Dual dispenser	Codling moth, hickory shuckworm, pandemic leafroller, oblique banded roller

⁶ The larval form that initially hatches out of the egg is the first instar larva.

Name	EPA Reg No.	Pear ester	Other pheromones?	Form	Target pests
Cidetrak CMDA + OFM Meso	51934-21	0.9%	1.6% codling moth pheromone; 1.09% oriental fruit moth pheromone	Dispenser	Codling moth, oriental fruit moth, hickory shuckworm, macadamia nut borer, KOA seedworm
Bedoukian Pear Ester Technical	52991-27	93.4%	-	Technical grade active ingredient (TGAI)	For further formulation of other end-use products

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Combinations in Experiments

Pear ester has been used experimentally in combination with the synthetic codling moth sex pheromone (codlemone) for monitoring (Knight et al., 2005) and mating disruption of the codling moth (Knight, Light, et al., 2012; Knight, Stelinski, et al., 2012). Researchers have combined pear ester with codlemone and navel orangeworm (*Amyelois transitella*) sex pheromone for simultaneous mating disruption of codling moth and navel orangeworm (Light & Knight, 2011). Researchers have used these combinations experimentally in monitoring traps (Knight, 2010; Knight et al., 2005, 2014), mating disruption dispensers (Light et al., 2017), and in microencapsulated sprays (Knight et al., 2018; Knight & Light, 2013; Kovanci, 2015).

Status

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Historic Use:

Throughout the 20th century, food chemists analyzed the flavor profiles of many foods with the intent of producing synthetic chemical flavors (Knight et al., 2018). Pear ester is a major flavor component of Bartlett pears (Jennings et al., 1964). About one-third of commercial “pear essence” by weight is pear ester (Tucker et al., 2003). The chemical identity of pear ester, ethyl (2E, 4Z)-decadienoate, was determined through analysis and chemical synthesis of an identical compound (Jennings et al., 1964). Heinz & Jennings (1966) confirmed the results of Jennings et al. (1964).

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From about 1970 onward, pest management professionals tried to chemically characterize host attraction for many insect pests. If there was a chemical basis for host attraction, that might be manipulated to change insect behavior and control the pest. Detailed attention was given to host plant volatiles with some success (Knight et al., 2018). However, many of the attractive plant volatiles were not specific enough or potent enough to be useful in pest management. Some promising candidates, such as (*E,E*)-*alpha*-farnesene, were chemically unstable in the field. A review of plant volatiles published in 1987 does not mention pear ester (Metcalf & Kogan, 1987).

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In the 1980s, researchers favored pheromones over kairomones in pest management experiments. For instance, Metcalf & Kogan (1987) found 134 publications on pheromones, but only 14 on plant-produced kairomones in the *Journal of Chemical Ecology* from 1980 to 1985. Pheromones are used by insects to communicate with each other. Pheromones are very potent and highly specific. Although there is some overlap, mating pheromones are often unique to a species (Cardé & Minks, 1995).

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Despite the relative neglect of kairomone research, Light et al. (2001) extracted several plant volatiles from ripe Bartlett pears. The best candidate for codling moth attraction was pear ester. Electroantennogram measurements showed both male and female adult codling moths, *Cydia pomonella*, could detect it in extremely small amounts. Light et al. (2001) concluded that pear ester was a very potent, highly specific codling moth kairomone.

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The researchers performed field tests in walnut orchards to see if codling moth was attracted to pear ester (Light et al., 2001). They used a lure containing 1 mg of pear ester as an attractant in standard Pherocon ICP or diamond shaped IIB traps. Later experiments found that delta traps were more effective (Knight & Light, 2005).

514 Pear ester was patented as a codling moth kairomone on July 24, 2001 (Light, 2001) and on March 4, 2003
 515 (Light, 2003). These publications stimulated further research (Knight et al., 2018; Light, 2016; Light et al.,
 516 2017). Pear ester products were granted EPA registration in 2011, and are now used in commercial pest
 517 management (Trécé, Inc., 2023).

518

519 **Organic Foods Production Act, USDA Final Rule:**

520 Pear ester is not mentioned in the Organic Foods Production Act nor in the USDA organic regulations at
 521 7 CFR part 205. Pheromones, for insect management, are allowed per § 205.601(f); however, pear ester is a
 522 kairomone, not a pheromone.

523

524 **International:**

525 Pear ester is not mentioned by name in international organic standards that we reviewed (see [Table 5](#),
 526 below). However, the Canadian organic standards allow pheromones and other semiochemicals. Pear ester
 527 is both a kairomone and a semiochemical and may therefore be permitted. Most of the international
 528 standards allow only pheromones and require that they be applied only in traps and dispensers.

529

530

Table 5: Pear ester and international organic standards

Standard	Applicable regulations	Allowed?	Source and use restrictions (if applicable)
Canada Organic Standards (CAN/CGSB 32.311-2020) (CAN, 2021)	Table 4.2. Substances for Crop Production.	Yes	Pear ester is not specifically listed, but pheromones and other semiochemicals are allowed. All sources are permitted. For pest control.
European Union Organic Standards (EU No. 2021/1165) (ECC, 2008)	Annex II. Pesticides, Plant Protection Products Section 4. Substances to be used in traps and/or dispensers	No	Pheromones, attractant sexual behavior disruptors only in traps and dispensers.
Japanese Agricultural Standard for Organic Products of Plant Origin (Japan, 2017)	Table 2. Agricultural Chemicals. Sex pheromone agent.	No	Only sex pheromones of insects harmful to crops permitted.
Codex Alimentarius Commission – Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL 32-1999) (WHO, 2007)	Annex 2. Permitted Substances for the Production of Organic Foods Table 2. Substances for Plant Pest and Disease Control Section V. Traps	No	Pheromone preparations
IFOAM-Organics International (IFOAM, 2014)	Appendix 3. Crop Protectants and Growth Regulators Section V. Traps, Barriers, Repellents	No	Pheromones – in traps and dispensers only

531

532 Evaluation Questions for Substances to be used in Organic Crop or Livestock Production

533

534 **Evaluation Question #1:** Indicate which category in OFPA that the substance falls under: (A) Does the
 535 substance contain an active ingredient in any of the following categories: copper and sulfur
 536 compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated
 537 seed, vitamins and minerals; livestock parasiticides and medicines and production aids including
 538 netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is
 539 the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological
 540 concern (i.e., EPA List 4 inerts) [7 U.S.C. 6517(c)(1)(B)(ii)]? Is the synthetic substance an inert ingredient
 541 which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180?

542 Pear ester is an active ingredient in monitoring trap lures for the codling moth, *Cydia pomonella* (Knight et
 543 al., 2005; Light et al., 2001). Pear ester is also an active ingredient in codling moth pheromone mating
 544 disruption formulations (Cidetrak, 2014; Knight & Light, 2014; Light et al., 2017). We did not find any

545 indication that pear ester is used as an inert ingredient in other pesticide products during our literature
546 review. However, inert ingredients in pesticide products are typically confidential.

547
548 **Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the**
549 **petitioned substance. Further, describe any chemical change that may occur during manufacture or**
550 **formulation of the petitioned substance when this substance is extracted from naturally occurring plant,**
551 **animal, or mineral sources [7 U.S.C. 6502(21)].**

552 The prevalent process for manufacturing pear ester is the condensation reaction between the eight-carbon
553 allyl alcohol, oct-1-yn-3-ol (CAS No. 818-72-4), and triethylorthoacetate (CAS No 78-39-7). The
554 condensation product is heated with propanoic acid as a catalyst, and the subsequent Johnson-Claisen
555 rearrangement gives ethyl 2E, 4Z-decadienoate. It is a convenient one-step synthesis with good yields
556 (Trécé, Inc., 2023; Tsubi et al., 1993).

557
558 The following steps to produce pear ester are described by Tsubi et al. (1993):

- 559 1. 12.1 g (0.096 mol) of oct-1-yn-3-ol is heated under reflux at 140-150 °C with 100 g (0.616 mols) of
560 ethylorthoacetate and 0.24 g (3.2 mmol) of a propanoic acid catalyst.
- 561 2. Every two hours, ethanol is removed by vacuum distillation, and more ethylorthoacetate (10 g) and
562 propanoic acid (0.024 g) is added.
- 563 3. The mixture is refluxed at these temperatures for 6-8 hours until all the oct-1-yn-3-ol is consumed.
- 564 4. Most of the oct-1-yn-3-ol is converted into pear ester (82-91% yields). The rest likely polymerizes
565 during distillation or is lost in side reactions.
- 566 5. Excess ethylorthoacetate is removed and recovered by vacuum distillation. Pear ester is also
567 recovered by vacuum distillation, with a boiling point 80-85°C at 0.3 torr.

568
569 Pear ester has a molecular weight of 196.28 g/mol. The molecular weight of the alcohol is 126.04 g/mol,
570 and that of the acetate is 162.22 g/mol. Typical yields are 15.4-17.2 g of pear ester, or 82-91% yield.

571
572 Relatively small amounts of these processing chemicals are needed to produce pear ester for the pest
573 control market. Witzgall et al. (2008) estimated that 77,000 ha (190,000 acres) of apples and pears in North
574 America are treated with mating disruption chemicals. Theoretically, all of the estimated acreage could be
575 treated once by applying 4.6 metric tons of pear ester.⁷ Two applications of the dispensers would use about
576 9.2 metric tons of pear ester.

577
578 The alcohol, oct-1-yn-3-ol, along with many other chemicals, is a by-product of petroleum processing, and
579 is commercially available from Sigma Aldrich Chemical Company. To produce 9.2 metric tons of pear
580 ester, 6.5 to 7.2 metric tons of the alcohol would be needed since yields are 82-91%.

581
582 Triethyl orthoacetate is used often in organic synthesis for acetylation and condensation reactions, and it is
583 commercially available from Sigma-Aldrich. To produce 9.2 tons of pear ester would require 8.3 to 9.3
584 metric tons of the acetate.

585
586 **Evaluation Question #3: Discuss whether the petitioned substance is formulated or manufactured by a**
587 **chemical process or created by naturally occurring biological processes [7 U.S.C. 6502(21)].**

588 Pear ester is manufactured by a chemical process. The prevalent manufacturing process produces synthetic
589 pear ester. Below, we discuss the classification in more detail, using NOP 5033-1, *Decision Tree for*
590 *Classification of Materials as Synthetic or Nonsynthetic* as a guide (NOP, 2016).

591
592 *Classification: Johnson-Claisen condensation reaction method*

593
594 1. *Is the substance manufactured, produced, or extracted from a natural source?*

595 No. It is produced by a condensation reaction between two chemicals that are by-products of petroleum
596 processing. According to the decision tree, it is therefore synthetic.

597

⁷ One application of Cidetrak 90/60 combo meso dispensers, applied with a maximum of 40 dispensers per acre, each containing 600 mg of pear ester would be used. That is about 24 g pear ester per acre.

598 **Evaluation Question #4: Describe the persistence or concentration of the petitioned substance and/or its**
599 **by-products in the environment [7 U.S.C. 6518(m)(2)].**

600 Pear ester has moderate chemical stability in the field, which makes it useful as a pest control product
601 (Light et al., 2001), but it does not persist in the environment away from treated areas. It dissipates and
602 degrades and does not accumulate (US EPA, 2013). About 72% is degraded in 28 days by the microbes in
603 sludge. The sludge test measures aerobic degradation of substances by microbes in the laboratory. Similar
604 aerobic degradation is expected from microbes in a field situation. The double bonds in the molecule are
605 vulnerable to oxidation and contact with water will slowly hydrolyze the ester to ethanol and 2E, 4Z-
606 decadienoic acid. It is moderately volatile in the environment, and because of this volatility the EPA has
607 exempted pear ester from a number of key environmental toxicity tests (Boudakian Research, 2023; US
608 EPA, 2013).

609
610 Pear ester does persist in areas where it is used for treatment, as intended for controlled release
611 formulations (Klassen et al., 2023). When used in controlled release dispensers, it is present in the field for
612 120-150 days (Trécé, Inc., 2023). It persists for about two weeks in microencapsulated controlled release
613 sprays, and for about eight weeks in monitoring traps (Kovanci, 2015).

614
615 The polyamide microcapsules from the spray may persist for some time. These microcapsules are made
616 through a process called interfacial polycondensation, in which two complementary monomers undergo
617 polymerization when droplets of one are mixed into a suspension of the other. The active ingredient is also
618 contained within the droplet. The polymerization occurs through condensation, through which the active
619 ingredient is encapsulated (Cryer, 2011; Dubey et al., 2009).

620
621 We found no published information on the persistence of these microcapsules of pear ester in the
622 environment. Microcapsules from dilute solutions of encapsulated methyl parathion can persist in soil for
623 32 months (Butler et al., 1981). Capsules of alachlor persist at least 47 days (Capri & Walker, 1993). For
624 comparison, chlorpyrifos emulsified concentrate lasts 60 days, whereas the microencapsulated formulation
625 lasts 120 days (Chen et al., 2014).

626
627 Sprayable microencapsulated formulations of pheromones are washed from tree canopies by rain.
628 Ultraviolet light degrades the pheromone and the plastic microcapsules. It is likely that the same thing
629 happens with microencapsulated pear ester (Waldstein & Gut, 2004; Wins-Purdy et al., 2007).

630
631 **Evaluation Question #5: Describe the toxicity and mode of action of the substance and of its breakdown**
632 **products and any contaminants. Describe the persistence and areas of concentration in the environment**
633 **of the substance and its breakdown products [7 U.S.C. 6518(m)(2)].**

634 Pear ester persistence is covered in [Evaluation Question #4](#) and [Evaluation Question #6](#). Available
635 information exploring the toxicity of pear ester is minimal. We did not find other literature that describes
636 the toxicity of pear ester beyond what we include within this report.

637
638 The EPA evaluated pear ester and had few concerns about environmental toxicity. According to the EPA,
639 “little or no exposure is expected for non-target species,” and “it is not known to be toxic to any insect
640 species or other non-target organism” (US EPA, 2013). When used at label application rates, adverse, non-
641 target effects are not expected (US EPA, 2013). Pear ester is extremely specific for codling moth (Knight &
642 Light, 2004).

643
644 Other species are attracted to pear ester only when the dose is increased or other kairomones are added to
645 lures or dispensers (Knight et al., 2014, 2019). For instance, Light et al. (2001) found codling moth limit of
646 detection in the laboratory was about 10 ng, while threshold detection for codling moth in the field was
647 about 10 micrograms. Lures effective for monitoring codling moth contain 1 mg, and 10 mg lures attracted
648 non-target insects (Light et al., 2001).

649
650 The EPA did not require testing for bird, fish, and aquatic invertebrate toxicity because pear ester is
651 expected to quickly disperse and degrade in the environment (US EPA, 2013). See [Evaluation Question #6](#).

652 However, the pear ester safety data sheet from Boudakian Research (Boudakian Research, 2023) states that
653 pear ester is “very toxic to aquatic life with long lasting effects.”

654
655 Pear ester has low toxicity to algae and water fleas. The EC₅₀ (72 hrs.) for algae is 0.13 mg/liter.⁸ The EC₅₀
656 (48 hrs.) for the water flea is 1.4 mg/liter (Boudakian Research, 2023). Other non-target effects are
657 discussed in [Evaluation Question #8](#).

658
659 Pest management uses of pear ester are mostly confined to apple, pear, and walnut orchards. Some pear
660 ester is used in monitoring traps (Knight et al., 2005; Knight & Light, 2005), but in terms of quantity, most
661 pear ester is used in mating disruption products for apples and pears (Trécé, Inc., 2023). See [Evaluation](#)
662 [Question #6](#) for more information on pear ester use rates and the implications for potential environmental
663 contamination.

664
665 **Evaluation Question #6: Describe any environmental contamination that could result from the**
666 **petitioned substance’s manufacture, use, misuse, or disposal [7 U.S.C. 6518(m)(3)].**

667
668 *Environmental Contamination from Production of Pear Ester*

669 Production of pear ester by the Johnson-Claisen condensation and rearrangement (see [Evaluation](#)
670 [Question #2](#)) is not likely to produce major environmental disruption. It is a one-step process where the
671 components are refluxed together. Ethanol is released and can be recovered by distillation. Most of the
672 processing chemicals are consumed in production or recycled. Vacuum distillation allows recovery of
673 product and other reaction chemicals (Trécé, Inc., 2023). In reactions of this type, a very small amount of
674 side reaction products is likely captured during distillation, or sticky polymeric residuals are left in the
675 bottom of the flask, which would be dealt with according to Good Manufacturing Practices.

676
677 Relatively small amounts of these processing chemicals are needed to produce pear ester for the pest
678 control market. The major use of pear ester in pest control is as a component of mating disruption
679 dispensers for the codling moth. Witzgall et al. (2008) estimated that 77,000 ha (190,000 acres) of apples and
680 pears in North America are treated with mating disruption each year.

681
682 A maximum of 9.2 metric tons of product would be applied over 190,000 acres each year (see [Evaluation](#)
683 [Question #2](#)). Furthermore, pear ester is not known to be toxic (US EPA, 2013). Therefore, production and
684 use of pear ester is not likely to lead to widespread environmental contamination. For comparison, about
685 150 million acres in the U.S. are treated with neonicotinoid insecticides each year (Krupke & Tooker, 2020).

686
687 *Environmental Effects from Use of Pear Ester*

688 According to the EPA, “When used in accordance with widespread and commonly recognized practice, it
689 (pear ester) will not generally cause unreasonable adverse effects on the environment” (US EPA, 2013). The
690 EPA reached this conclusion because pear ester exposures from treatments are similar to emissions from
691 natural pear orchards. It is volatile and dissipates quickly in the environment. When it volatilizes, it readily
692 undergoes oxidative photodegradation. Non-target effects are not expected from label application rates.
693 The rate of environmental exposure from dispensers and microencapsulated sprays is a key factor in pear
694 ester’s low risk for environmental contamination (US EPA, 2013).

695
696 *Volatility in the Environment*

697 Volatility in the environment can be measured by Henry’s law. A regulatory threshold is a Henry’s law
698 constant greater than 5×10^{-5} atm-m³/mol. If the constant exceeds this threshold, the substance is
699 considered highly volatile and dissipates quickly. The pear ester Henry’s law constant is 7.54×10^{-4} atm-
700 m³/mol (Trécé, Inc., 2023). The volatility of a saturated solution of pear ester in water is near that of water
701 (US EPA, 2013). Therefore, the substance is exempt from testing for bird, fish, and aquatic invertebrate
702 toxicity.

703

⁸ The EC₅₀ is the concentration of a substance that produces a half-maximal response; that is, a response that is halfway between the baseline and maximum, after a specified time.

704 *Degrades Quickly*

705 The EPA states that pear ester dissipates quickly, and it undergoes oxidative photodegradation. This
706 assertion makes sense, because there are two double bonds in the molecule that are vulnerable to oxidation
707 (US EPA, 2013). According to the Boudakian SDS (Boudakian Research, 2023), activated sludge destroys
708 72% of pear ester (30 mg/liter) in 28 days. Pear ester then readily undergoes aerobic biodegradation
709 (Boudakian Research, 2023).

710

711 **Evaluation Question #7: Describe any known chemical interactions between the petitioned substance**
712 **and other substances used in organic crop or livestock production or handling. Describe any**
713 **environmental or human health effects from these chemical interactions [7 U.S.C. 6518(m)(1)].**

714 Pear ester dispensers protect the formulation from other substances used in organic production. Pear ester
715 is released as a gas from dispensers. Concentrations are low and should not interact with any pesticide
716 sprayed on trees (see [Evaluation Question #6](#)). When microencapsulated pear ester sprays are used, the
717 polyamide capsules should give some protection against pesticide formulations applied to trees.

718

719 Tank mixes of microencapsulated pear ester and other insecticides are used. But the encapsulated
720 formulation must be chemically compatible with any tank mixes. Acids, bases, and oxidizing agents could
721 be incompatible (Boudakian Research, 2023; Cidetrak, 2020; US EPA, 2013).

722

723 Insecticides that might be used with organic apples and pears include soap, oil, spinosad, neem oil, *Bacillus*
724 *thuringiensis* (BT), codling moth virus, kaolin, and natural pyrethrins (Pfeiffer, 2017). Dispensers and
725 microencapsulated pear ester sprays should not conflict with any of these. In fact, because pear ester
726 increases movement of larvae, it should make insecticides that work by contact more effective (Knight &
727 Light, 2013; Light & Knight, 2011).

728

729 For walnut orchards, tank mixes of microencapsulated pear ester were compatible with spinosad, codling
730 moth granulosis virus, and other insecticides (Light & Knight, 2011). Pear ester made the other pesticides
731 more effective (Light & Knight, 2011).

732

733 Tank mixes of microencapsulated pear ester with codling moth insecticides such as spinosad gave less
734 consistent results when used on apple orchards. The combination reduced serious fruit injury but did not
735 reduce superficial damage. The combination likely increased mortality, but the larvae were able to do some
736 damage before they died (Knight & Light, 2013).

737

738 **Evaluation Question #8: Describe any effects of the petitioned substance on biological or chemical**
739 **interactions in the agro-ecosystem, including physiological effects on soil organisms (including the salt**
740 **index and solubility of the soil), crops, and livestock [7 U.S.C. 6518(m)(5)].**

741

742 *Mating Disruption Changes the Pest Spectrum*

743 Organic insecticides such as spinosad or pyrethrins can kill beneficial insects. Using mating disruption
744 products with or without pear ester changes the pest spectrum in a pear orchard because less insecticide is
745 needed, and the number of beneficial insects increase (Brunner et al., 1992). This means there are fewer
746 pests like pear psylla, mealybugs, and mites in pear orchards where mating disruptors are used, because
747 the pests are consumed by beneficial insects (Brunner et al., 1992).

748

749 Apple orchards treated with mating disruption products have fewer leafhoppers and leafminers, while
750 aphid and mite populations are generally unchanged (Brunner et al., 1992). But mating disruption leads to
751 an increase in pest leafrollers other than the codling moth. Because leafrollers can increase, there are
752 mating disruption dispensers that simultaneously control codling moth and leafrollers (Brunner et al.,
753 1992) (see [Combinations of the Substance](#)).

754

755 In addition, by prolonging the time before larvae find shelter inside fruit, predation can be enhanced.
756 Lacewing releases should be more effective. Confused larvae may also be blown off the tree by wind, or
757 washed off by rain or overhead irrigation (Light & Beck, 2012).

758

759 *Trichogramma* spp. use the vine mealybug sexual pheromone as a kairomone to find prey (Cocco et al.,
760 2021). It is possible that either pear ester or codling moth sexual pheromone could be used by *Trichogramma*
761 in this way, but no information has been published in CAB Abstracts on this subject.

762
763 *Low Emissions*

764 The amounts of pear ester added to the environment by monitoring traps are extremely small. Emissions
765 from commercial monitoring lures are about 20-60 µg/day, since the lure itself is about 1-3 mg and it lasts
766 about 8 weeks (Kovanci, 2015). The largest releases from dispensers, 208 mg/acre/day are about
767 4.8 µg/ft²/day.

768
769 These amounts are likely too small to affect microbe survival or distribution, especially since pear ester is
770 very volatile and degrades quickly (US EPA, 2013). Antibiotic action of pear ester is not mentioned in the
771 EPA evaluation, the SDS, or the PubChem database (Boudakian Research, 2023; National Library of
772 Medicine, 2024; US EPA, 2013).

773
774 Emissions from pear ester treatments are similar to natural emissions in a pear orchard. Therefore, treated
775 areas should not produce unexpected consequences for natural flora and fauna (US EPA, 2013).

776
777 *Effects on Non-Target Insects*

778 Toxicity tests of pear ester on insects are rarely published. But Asche et al. (2023) found that pear ester
779 solutions added to 17% sugar water were toxic to paper wasps, *Polistes dominula*. About 20% of paper wasp
780 workers were killed (6.7%) or paralyzed (14.6%) after ingestion of an average 10.6 µl of sugar water
781 containing 10% (w/v) pear ester.

782
783 About 10 µl of sugar water containing 10% (w/v) pear ester would contain about 1 µg pear ester. Each
784 wasp consumed about 1 µg pear ester, and 6.7% died. Toxicity was extremely variable, and 80% of wasps
785 were unaffected by this dose (Asche et al., 2023). Maximum exposure from dispensers is
786 4.8 micrograms/ft²/day, less than 0.15 µg /ft²/hour. The dispensers are not likely to be toxic to *Polistes*
787 *dominula*.

788
789 Exposure of paper wasps to microencapsulated sprays is about 42.8 mg/acre/day, or about 1 µg/ft²/day
790 or 40 ng/ft²/hr. This amount is not likely to be toxic to paper wasps. The maximum label application
791 would be airborne exposure of about 5.8 µg/ft²/day or 240 ng/ft²/hr., an amount that is still not likely to
792 be toxic. However, an air blast sprayer is used to apply the formulation (Light & Beck, 2010), which may
793 disrupt paper wasps and other insects.

794
795 Yellowjackets, *Vespula vidua* and *V. pennsylvanic*, feed on pear, and are attracted by lures of 10 mg (Light et
796 al., 2001), but especially 20-40 mg (Knight & Light, 2004). The use of pear ester at these levels can therefore
797 impact other insects.

798
799 Some stinkbugs are attracted to pear ester. Low numbers appear in traps baited with 20 mg pear ester. Pear
800 ester is structurally similar to the sex pheromone of the stinkbug, *Euschistus conspersus*; the stinkbug
801 pheromone is the methyl ester of (E2), (Z4)-decadienoic acid, and pear ester is the ethyl ester (Light et al.,
802 2001).

803
804 The pest moths *Hedya nubiferana*, *Cydia fagiglandana*, *Cydia splendana* are attracted to 10 mg pear ester lures.
805 But 10 mg lures did not attract eight lepidopteran pest species that are common pests of many orchard
806 crops (Knight & Light, 2004). However, pear ester attracts males of the oriental fruit moth, *Grapholita*
807 *molesta*, in apples and pears, but not peach. Because of this, pear ester can be used for monitoring the pest
808 in apple and pear, but not in peach (Molinari et al., 2010).

809
810 In addition to codling moths, monitoring traps also capture flies and honey bees, but the number captured
811 can be minimized by choosing the most suitable trap color. White traps catch the most honey bees, while
812 red and green traps catch the fewest (Knight & Miliczky, 2003).

813

814 *Effects on Honey Bees*

815 Pears require pollination, and most of that is done by bees. Su et al. (2022) showed that bee foraging is
816 affected by pear flower volatiles. Electroantennogram measurements show that bees can detect at least 16
817 flower volatiles (Su et al., 2022). While the effect of pear *flower* volatiles on bee foraging behavior has been
818 tested by researchers, pear *ester* has not been tested. Linalool and *alpha*-farnesene are two pear flower
819 volatiles that Su et al. found were active in affecting bee foraging behavior. These compounds are
820 sometimes used to increase the number of codling moths trapped by pear ester lures. Bees might be
821 attracted to this kind of trap (Knight et al., 2019).

822
823 Bees are known to pick up particles of microencapsulated pesticide formulations (Barker et al., 1979).
824 Effects were noticed with the first microencapsulated insecticide, the organophosphate methyl parathion.
825 The size of the particles is near that of pollen, and the particles are taken back to the hive. If the pesticides
826 are toxic, as in the case of methyl parathion, bees can be harmed and populations significantly affected
827 (Barker et al., 1979).

828
829 Toxicity tests of pear ester on bees have not been published. If toxicity is similar to paper wasp, ingestion of
830 1 µg of pear ester might be toxic to some of them (Asche et al., 2023). It is also possible for
831 microencapsulated pesticides to enter into bee products, such as honey and pollen. For example,
832 researchers have found that both honey and pollen can be contaminated by microencapsulated methyl
833 parathion (Atkins & Kellum, 1984). Foraging bees have been found with microcapsules in their midguts
834 (Burgett & Fisher, 1980).

835
836 If bees have the same response as paper wasps, bees would have to pick up >8000 particles of
837 microencapsulated pear ester and ingest them all to get any toxic effects.⁹ Bees forage in flowers.
838 DA MEC™ sprays are applied to tree canopies, and if the spray occurs while the trees are flowering, some
839 bees might be adversely affected.

840
841 **Evaluation Question #9: Discuss and summarize findings on whether the use of the petitioned**
842 **substance may be harmful to the environment [7 U.S.C. 6517(c)(1)(A)(i) and 7 U.S.C. 6517(c)(2)(A)(i)].**
843 Environmental damage is likely small, because small amounts are generally used (3 mg pear ester/tree;
844 600 mg pear ester/acre), and usage is confined to orchards. However, we cannot provide a thorough
845 analysis because the EPA exempted pear ester and the formulations from many of the usual environmental
846 toxicity tests (US EPA, 2013), and other studies detailing pear ester toxicity are limited.

847
848 Pear ester applications are generally expected to have benign effects on the environment (US EPA, 2013).
849 Emissions from monitoring lures are very small, since the lure itself is about 1-3 mg and lasts about 8
850 weeks (Kovanci, 2015). Emission rates are discussed in detail in [Specific Uses of the Substance](#).

851
852 Polyamide microencapsulated formulas of pear ester such as Cidetrak® DA MEC™ (EPA Reg. No. 51934-
853 12) can be sprayed about every two weeks, and up to 8 times a year. The average pear ester emission rate of
854 42.8 mg/acre/day over a two-week period should not cause environmental toxicity. According to the EPA,
855 pear ester is dispersed and destroyed quickly (Light & Beck, 2010; US EPA, 2013).

856
857 Once applied, microcapsules probably stay on the leaves until dislodged by wind and rain. That is the case
858 for microencapsulated sprayable pheromones (Knight et al., 2004). When particles are dislodged by rain,
859 they likely become part of runoff from an orchard (Trécé, Inc., 2023). We found no information on the
860 environmental effects of pear ester polyamide microcapsules.

861
862 According to the safety data sheet, pear ester is a marine toxicant and hazard (Boudakian Research, 2023).
863 Environmental damage may be mitigated by the low application rate of 12 g DA MEC™/acre or 30 g/ha.
864 That is about 0.27 mg DA MEC™/ft². That is a small amount, but each ml of the usual diluted field spray
865 contains about 260,000 particles (Light & Beck, 2010). There is no published information of the effects of

⁹ The DA MEC™ spray contains about 259 microencapsulated pear ester particles/mg of diluted field spray, and 8288 × 10³ pear ester particles/mg of concentrate (Light & Beck, 2010). Each 1 µg of concentrate contains about 8288 pear ester particles.

866 these particles on earthworms. If earthworms ingest them, birds would be exposed by eating earthworms.
867 However, again, the amounts of pear ester involved are very small.

868
869 Once the microencapsulated particles reach the water, they might be ingested by fish or other aquatic
870 creatures. The pear ester contained in the microparticles is an aquatic hazard (Boudakian Research, 2023).
871 No density information is given (Light & Beck, 2010), but likely the polyamide particles are less dense than
872 water. We found no information on whether the polyamide capsules are a hazard. The EPA did not require
873 the product manufacturer to submit environmental toxicity tests of microencapsulated pear ester (US EPA,
874 2013).

875
876 **Evaluation Question #10: Describe and summarize any reported effects upon human health from use of**
877 **the petitioned substance [7 U.S.C. 6517(c)(1)(A)(i), 7 U.S.C. 6517(c)(2)(A)(i) and 7 U.S.C. 6518(m)(4)].**

878 Pear ester has low acute toxicity to mammals, and the oral LD₅₀ for rats is 4,027 mg/kg.¹⁰ This number
879 means pear ester is nearly non-toxic. Pear ester is an FDA approved food additive, and average human
880 consumption in the U.S. is about 3 µg per day (US EPA, 2013).

881
882 According to the EPA, pear ester also has low chronic toxicity, and is not a likely developmental toxicant,
883 or a mutagen. It is not on the EPA list of carcinogens, or on the IARC carcinogen list. It has not been tested
884 for endocrine disruption (US EPA, 2013).

885
886 According to the pear ester safety data sheet, it may cause allergy or asthma symptoms or breathing
887 difficulties if inhaled. Contact with skin or eyes may cause irritation (Boudakian Research, 2023).

888
889 Pear ester is a Generally Recognized as Safe (GRAS) food additive. The EPA exempted it from the need to
890 establish food tolerance concentrations in 2013. The EPA concluded that “there is a reasonable certainty
891 that no harm will result to the U.S. population from aggregate exposures to ethyl-2E-4Z-decadienoate (pear
892 ester)” (78 FR 53051, August 28, 2013).

893
894 *Occupational Exposure*

895 The food tolerance exemption provided by the EPA does not include an evaluation for occupational
896 exposure.

897
898 The maximum average pear ester that volatilizes into a walnut orchard from CMDA 90/60 meso
899 dispensers is 208 mg/acre/day (see [Specific Uses of the Substance](#)). Dispensers used in apple and pear
900 orchards contain less pear ester, and the maximum average is 163 mg/acre/day (Knight & Light, 2014).
901 The amount of pear ester that naturally volatilizes in an untreated pear orchard is 120 mg/acre/day (Trécé,
902 Inc., 2023). Occupational exposures should be less than this amount, as workers are not expected to be in
903 the field 24 hours a day.

904
905 DA MEC™ sprays are not applied uniformly; only trees are sprayed. Since the vapor density of pear ester
906 is about 6.8 times that of air (US EPA, 2013), the emissions drift downward from the tree canopy to the base
907 of each tree. Workers might be exposed for 8 hours, so the pear ester emission rate considered over 8 hours
908 is 70 µg /tree/8-hour day. Workers spending all day next to a treated tree are usually exposed to less than
909 70 µg of pear ester per day. The maximum label amount is 5.83 times greater or about 400 µg pear
910 ester/day. This amount is well below the acute toxicity of 4027 mg/kg. Pear ester vapors are not likely a
911 health problem for orchard workers.

912
913 *Exposure to Polyamide Particulates*

914 Sprays of about 30 g/ha DA MEC™ are applied to tree canopies with an air blast sprayer (Cidetrak, 2020).
915 Very small amounts of DA MEC™ are used, but the sprays contain a large number of small polyamide
916 particles. Each tree canopy receives about 500 million microencapsulated pear ester particles.¹¹ There might

¹⁰ The LD₅₀ is the amount of a substance needed to kill 50% of the animals in a population within a specific period.

¹¹ The number of apple trees in a commercial orchard is widely variable, around 188-1000 trees/ha. On average, there are very roughly about 500 apple trees/ha (Knight, 2006; Knight, Light, et al., 2012; Knight, Stelinski, et al., 2012; Knight & Light, 2005, 2014).

917 be a respiratory hazard from inhaling the plastic microparticles when the spray is applied by air blast
918 sprayer to individual trees.¹² However, effects of exposure to the polyamide spherical capsules in the spray
919 has not been evaluated by the EPA. There is a 4-hr re-entry restriction, so the greatest acute risk is probably
920 during spray applications with an airblast sprayer. But the DA MEC™ label does not require respiratory
921 protection for workers (Cidetrak, 2020).

922
923 Generally, chronic exposure to any airborne particles can lead to health problems. Zanobeti et al. (2000)
924 found that chronic exposure to airborne particles less than 10 µm diameter (PM₁₀) led to increased hospital
925 admissions for heart and lung disease for persons 65 years or older. An increase of 10 µg/m³ of PM₁₀ led to
926 observed adverse effects.

927
928 Many later studies have confirmed the adverse effects from particulate exposure. The current 24-hr PM₁₀
929 Standard is 150 µg/m³ (89 FR 16202, May 6, 2024). PM_{2.5} covers exposures below 2.5µm. The 24-hr PM_{2.5}
930 Standard is 35 µg/m³ (89 FR 16202, May 6, 2024).

931
932 With DA MEC™ sprays, each tree is usually treated with 60 mg of a formulation containing polyamide
933 microcapsules. Not all of this is polyamide, as there is also water and coformulants (Light & Beck, 2010).
934 There is no monitoring data available for airborne particles of microencapsulated DA MEC™ sprays in
935 orchards. Sprayable microencapsulated pheromone particles can be washed out of tree canopies by wind,
936 rain, and overhead irrigation sprays. Pear ester likely meets the same fate (Knight et al., 2004).

937
938 In a worst-case scenario of all 60 mg of particles gradually drifting down over the course of 14 days, about
939 4.3 mg/tree would be airborne every 24-hr day. Workers would be exposed to 1.5 mg/tree over an 8-hr
940 day. Each tree occupies a 20 m² footprint, and workers about 2 m tall would be exposed in a 40-m³ air
941 volume. Maximum 8-hr worst case chronic exposure would be about 0.0357 mg/m³ or 36 µg/m³. This
942 exposure is below the U.S. 24-hr particulate standard of 150 µg/m³ for PM 10 (89 FR 16202, May 6, 2024).

943
944 A more reasonable estimate would be exposure to the 3 mg of microencapsulated pear ester usually
945 applied to each tree. Chronic exposure to microencapsulated pear ester would be about 2 µg/m³ over an 8-
946 hr day. This number is well below the PM₁₀ standard of 150 µg/m³ and is also below the PM_{2.5} standard of
947 35 µg/m³ (89 FR 16202, May 6, 2024). The maximum label application of pear ester would lead to about 12
948 µg/m³ over an 8-hr day. This exposure is still below federal standards. These calculations are highly
949 speculative, but they might give at least an idea of chronic exposure potential.

950
951 We found no publications indicating harm to humans from pear ester or polyamide particulates. But
952 according to the pear ester safety data sheet, pear ester may cause allergy or asthma symptoms or
953 breathing difficulties if inhaled. Contact with skin or eyes may cause irritation (Boudakian Research, 2023).

954
955 **Evaluation Question #11: Describe all natural (non-synthetic) substances or products which may be**
956 **used in place of a petitioned substance [7 U.S.C. 6517(c)(1)(A)(ii)]. Provide a list of allowed substances**
957 **that may be used in place of the petitioned substance [7 U.S.C. 6518(m)(6)].**

958 Natural substances used instead of pear ester for codling moth control include codling moth granulosis
959 virus, and other microbes such as *Beauveria bassiana*, *Metarhizium anisopliae*, and *Bacillus thuringiensis*
960 *kurstaki* (Btk) (Caprile & Vossen, 2011). Applications must be timed to expose codling moth larvae (see
961 [Codling Moth Life Cycle and Monitoring](#)). These substances function differently than pear ester and are not
962 true “alternatives.” Rather, these are substances that could also be used in codling moth pest management.
963 In many cases, these substances could be used in conjunction with pear ester for increased effectiveness.

964

Each tree receives 60 mg DA MEC™ containing 5% or 3 mg microencapsulated pear ester. The concentrated solution contains about 8.3 million particles/mg (Light & Beck, 2010).

¹² The diluted field application spray contains about 260,000 particles/ml or about 260,000 particles/gram (Light & Beck, 2010).

965 *Codling moth granulosis virus*

966 There are a few commercially available products that use codling moth granulosis virus as the active
967 ingredient (National Pesticide Information Center, 2024). Some of these are OMRI Listed as of May 2024,
968 such as (OMRI, 2024):

- 969 • CYD-X® HP Insecticidal Virus High Potency Aqueous Suspension Biological Insecticide for
970 Control of the Codling Moth (Certis)
- 971 • CYD-X® Insecticidal Virus An Aqueous Suspension Biological Insecticide for Control of the
972 Codling Moth (Certis)
- 973 • Virosoft™ CP4 BIO-Insecticide (Biotepp, Inc.)

974

975 Field tests of codling moth granulosis virus in walnuts over a 3-year period in California showed 60-80%
976 control (Vail et al., 1991). However, applications must be timed to coincide with egg hatch. The virus does
977 not persist, so repeated applications are necessary. The codling moth must eat the virus for this method to
978 be effective. It attacks the larval stage only and must be present at the larval point of entry into the fruit
979 (Vail et al., 1991).

980

981 Another problem is that the virus may kill the codling moth larvae, but the larvae may survive long
982 enough to infest fruit, therefore, fruit damage may not be reduced (Arthurs et al., 2007). Similarly, Btk and
983 fungal treatments work best when applied at the early larval stage. Treatments must be timed with
984 monitoring and the biofix point (Caprile & Vossen, 2011; University of California Statewide IPM Program,
985 2015).

986

987 *Spinosad*

988 Spinosad, a nonsynthetic substance used in organic agriculture is also an alternative. There are numerous
989 commercially available products that use spinosad as the active ingredient (National Pesticide Information
990 Center, 2024). Many of these are OMRI Listed (OMRI, 2024). Due to the number of spinosad products
991 available, we recommend searching the National Pesticide Information Center database and cross-
992 referencing products with data from material review organizations such as OMRI for a complete list.

993

994 Spinosad is very effective for control of caterpillars, such as the larval stages of the codling moth. Spinosad
995 is applied three times at ten-day intervals, starting with egg hatch. It is more effective when mixed with 1%
996 horticultural oil (Caprile & Vossen, 2011). According to Caprile & Vossen (2011), horticultural oil by itself
997 gives inconsistent results.

998

999 *Bacillus thuringiensis kurstaki (Btk) and pyrethrins*

1000 Btk and pyrethrins are not very effective for codling moth control. Btk must be ingested, and pyrethrins are
1001 quickly inactivated in the environment. Multiple applications must be used, and application timing must
1002 be very good (Caprile & Vossen, 2011). Commercial orchards have a very low tolerance for codling moth
1003 damage. While pyrethrin products are widely available, most (but not all) Btk products have had their
1004 registrations cancelled (National Pesticide Information Center, 2024). Because these products are not very
1005 effective for this application, we are not listing specific products. However, as with spinosad, interested
1006 parties can easily search these materials by using the National Pesticide Information Center database and
1007 cross reference products on OMRI and other material review organization websites.

1008

1009 *Codling Moth Life Cycle and Monitoring*

1010 All of these materials rely on timing treatments with the codling moth life cycle. This timing relies on
1011 monitoring traps and measurement of degree-days to determine when treatment should start. A degree-
1012 day has elapsed when the average of maximum temperature and minimum temperature on a given day is
1013 one degree above 50°F, the codling moth developmental threshold (University of California Statewide IPM
1014 Program, 2015). When maximum temperatures are hotter than 88°F, the upper developmental threshold,
1015 88°F is used as the maximum temperature (University of California Statewide IPM Program, 2015).

1016

1017 In California apple orchards, insecticidal sprays are applied at egg hatch, 200-250 degree-days after the
1018 biofix point. If there are a lot of moths, sprays are applied after 160 degree-days (Caprile & Vossen, 2011;

1019 University of California Statewide IPM Program, 2014, 2015). In Washington, sprays are applied about 139
1020 degree-days past biofix. The biofix point is at the end of April in Washington (Knight & Light, 2005).
1021
1022 In California walnut orchards, the first flight of the codling moth has two peaks. The first insecticide is
1023 applied at 300 degree-days past biofix during the first peak (University of California Statewide IPM
1024 Program, 2017).
1025
1026 The codling moth usually has three flights a year, and development depends on the number of sunny,
1027 warm days (degree-days). Pheromone monitoring traps can be used to time treatments with the
1028 appearance of codling moths in the traps (Witzgall et al., 2008). In orchards not treated with mating
1029 disruption, pheromone monitoring traps are adequate. Only males are attracted to sex pheromone traps,
1030 but this gives commercial orchards good data for males with which they can set action thresholds (Knight
1031 & Light, 2005; Light et al., 2001).
1032
1033 In orchards treated with mating disruption, monitoring is more effective with pear ester in combination
1034 with pheromones. Females are attracted to the combination, allowing action thresholds to be set for egg
1035 laying females (Knight & Light, 2005). To improve female capture, other substances such as acetic acid can
1036 be added to the monitoring traps (Knight et al., 2014, 2019).
1037
1038 **Evaluation Question #12: Describe any alternative practices that would make the use of the petitioned**
1039 **substance unnecessary [7 U.S.C. 6518(m)(6)].**
1040 Cultural controls and mass trapping have been used in Integrated Pest Management programs to control
1041 the codling moth (Knight et al., 2022; Madsen et al., 1976). A labor-intensive cultural control is to bag each
1042 fruit as it develops. This approach prevents damage but might only be useful on small plots due to the
1043 labor needed (Caprile & Vossen, 2011). Sanitation is another important cultural control. Infested or
1044 dropped fruit should be removed to interrupt the codling moth life cycle. Pruning and thinning can also
1045 help reduce damage. These procedures are also part of fire blight management. Additionally, resistant
1046 species such as early maturing pears and apples can reduce damage from codling moths (Caprile &
1047 Vossen, 2011).
1048
1049 Another reasonably effective alternative to the use of pear ester for codling moth mating disruption is the
1050 use of codlemone without pear ester. Witzgall et al. (2008) cite an areawide mating disruption program in
1051 apple orchards that reduced the number of insecticide sprays from 2.9 to 0.5 a year over a 5-year period.
1052 Fruit damage was reduced from 0.8% to 0.03%. Areawide treatments reduce damage from immigration of
1053 already mated females. In general, though, codling moth mating disruption without pear ester is less
1054 effective (Kovanci, 2015; Light et al., 2017) (see [Focus Question #1](#)).
1055
1056 Monitoring traps using only codlemone are adequate for determining an initial biofix point for codling
1057 moth first flight (Knight & Light, 2005; University of California Statewide IPM Program, 2015), but
1058 codlemone lures alone are not useful after mating disruption programs are established (Trécé, Inc., 2023).
1059
1060 Integrated Pest Management programs with applications of insecticides such as spinosad and codling moth
1061 granulosus virus can be effective for organic codling moth management. However, the addition of pear
1062 ester increases the effectiveness of insecticide management (Caprile & Vossen, 2011; Knight & Light, 2013;
1063 Light & Knight, 2011).
1064
1065 Commercially available biocontrol includes releases of the parasitic wasp *Trichogramma platneri* and
1066 nematodes. *Trichogramma* is an egg parasitoid, therefore, its release must be timed for the egg stage. It is
1067 more effective in walnuts and pears than in apples. Timing involves establishing the biofix point with
1068 monitoring traps and counting degree-days. Monitoring is important for establishing release times (Caprile
1069 & Vossen, 2011).
1070
1071 Nematodes (*Steinernema feltiae*) target the larval and prepupal stages of the codling moth. They are most
1072 effective when applied to the tree trunks (wrapped in burlap) and the soil underneath the trees. Later
1073 larval instars crawl down the tree trunk to pupate on the tree or in the soil. Nematode applications must be

1074 timed for these prepupal stages (Kaya et al., 1984). Nematodes applied to tree trunks wrapped in burlap
1075 led to 80-95% moth mortality in California. Best results are obtained when nematodes are applied during
1076 wet, winter months (Kaya et al., 1984).

Focus Question

Focus Question #1: Compare the performance of pheromone-only lures with combination lures with pear ester or other kairomones.

1083 *Monitoring traps baited with combo lures of codling moth sex pheromone (codlemone) and pear ester can catch more*
1084 *moths than traps baited with codlemone alone or pear ester alone.*

1085 Joshi et al. (2011) compared monitoring traps baited with codling moth pheromone only (PH), pear ester
1086 only, and combinations of pear ester and pheromone. Experiments were conducted both in apple orchards
1087 treated with pheromone mating disruption dispensers (MD) and with those not using mating disruption
1088 dispensers.

1090 The combination lure trapped significantly more codling moths in MD orchards than PH or pear ester lures
1091 (Joshi et al., 2011). Both males and females were trapped, but significantly more males were trapped with
1092 the combo lure than with pheromone only lures. The addition of pear ester enhanced the attractiveness of
1093 codlemone to males (Joshi et al., 2011).

1095 In non-MD orchards, there was no significant difference in effectiveness between pheromone-only lures
1096 and the combination lure (Joshi et al., 2011). In both MD orchards and non-MD orchards, pheromone alone
1097 was a more effective attractant than pear ester alone (Joshi et al., 2011).

1099 Results for trapped females vary according to conditions. Some research shows that combo lures can catch
1100 more females than pear ester alone (Knight et al., 2005; Light et al., 2001). Other research shows the combo
1101 caught few, or no females (Joshi et al., 2011; Trimble & El-Sayed, 2005).

1103 Fernandez et al. (2010) compared lures baited with codling moth sex pheromone alone, pear ester alone,
1104 and combo lures containing both. Experiments were conducted in apple and pear orchards being treated
1105 with pheromone mating disruption over the course of two years. Combo lures attracted significantly more
1106 codling moths, both males and females over a season. Effects were significant for the first and second
1107 flights, but not always the third flight of the season (Fernández et al., 2010).

1109 *Combo monitoring lures containing pheromone and pear ester are less effective when mating disruption dispensers*
1110 *also contain both pheromone and pear ester.*

1111 Combo (pear ester + PH) lures are more effective in trapping males in apple, pear, and walnut, than PH-
1112 only lures. The combo is more effective in both untreated and in mating disruption orchards using PH-only
1113 dispensers (Light, 2016). However, with the development of mating disruption dispensers using both pear
1114 ester and codlemone, better lures were needed. The mating disruption dispensers were using the same
1115 substances as the monitoring lures, and trapping was less effective. Lures were improved by adding acetic
1116 acid or other kairomones to the lure (Knight et al., 2014; Light, 2016).

1118 Addition of acetic acid to pheromone lures or combo lures of pear ester and pheromone resulted in
1119 increased trap effectiveness for females in conventional apple or walnut orchards and apple orchards
1120 treated with pheromone dispensers (Knight, 2010; Light, 2016).

1122 Light (2016) treated walnut orchards with a variety of MD dispensers and monitored results with lures of
1123 pear ester, PH, combo (pear ester and PH), acetic acid (AA), and pear ester and AA, PH + AA. Female trap
1124 captures were greater with traps baited with dual lures, either pear ester and AA or combo and AA
1125 compared to lures containing only one attractant.

1127 Combination dispensers with sex pheromone and pear ester increase the effectiveness of codling moth mating
 1128 disruption compared to dispensers loaded only with codling moth sex pheromone.
 1129 Light et al. (2017) found that the addition of pear ester to pheromone dispensers loaded with codling moth
 1130 sex pheromone enhanced the mating disruption effects of the pheromone. Large meso dispensers (50/ha)
 1131 were used in a four-year study of walnut orchards. Efficacy was determined by counting the number of
 1132 males caught in monitoring traps and by determining the mated status of captured females (Knight, 2006).
 1133 There were significantly more unmated females (33%) with the combination treatment compared with
 1134 pheromone alone (18-26%) or no treatment (6%). Combination treatments also reduced the number of
 1135 multimated females. There were 6% in combo treatments, 13-18% in pheromone only, and 23% in
 1136 untreated areas (Light et al., 2017).

1137
 1138 Knight et al. (2014) studied apple orchards treated with standard codling moth sex pheromone dispensers
 1139 for mating disruption versus those treated with dispensers containing sex pheromone plus pear ester.
 1140 Monitoring traps baited with virgin codling moth females caught significantly fewer males in orchards
 1141 treated with combo dispensers compared to pheromone dispensers alone. The authors concluded that
 1142 combo dispensers were more effective for mating disruption compared to dispensers releasing only sex
 1143 pheromone.

1144
 1145 In wind tunnel experiments, Schmera & Guerin (2012) showed that adding pear ester, *R*(+)-limonene,
 1146 linalool, or (*E*)-beta-farnesene to dispensers loaded with codling moth sex pheromone increased the
 1147 proportion of males flying toward the pheromone source, and reduced reaction times to the stimulus.

1148
 1149 Stelenski et al. (2013) concluded that pear ester by itself was a codling moth mating disruptant. However,
 1150 they found that the combination of pear ester and codlemone was not significantly more effective than
 1151 codlemone alone. It is difficult to draw a conclusion from this data because the authors speculated that
 1152 their plot sizes were too small to yield a statistically meaningful result (Stelinski et al., 2013).

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Report Authorship

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1155
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1164

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