

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: April 29, 2011

Subject: Pheromones Sunset

Chair: Tracy Miedema

The NOSB hereby recommends to the NOP the following:

Rulemaking Action X
Guidance Statement
Other

Statement of the Recommendation (Including Recount of Vote):

Relist: **§205.601 Synthetic substances allowed for use in organic crop production.** (f) As insect management. Pheromones.
A motion that would have qualified the listing “provided that they are formulated with only approved inert ingredients” was withdrawn.

Rationale Supporting Recommendation (including consistency with OFPA and NOP):

Because pheromones, understood to be an important tool in organic production, represent such a broad range of formulations and chemical ingredients, the Crops Committee sought to define the class of chemicals allowed in this listing by originally recommending the approval of pheromone products that are in passive dispensers, have no added toxicants, and only include inert ingredients that are approved by this Board. Passive dispensers, as understood by the Committee, are those which emit pheromones by volatilization rather than by spray and produce a concentration of pheromones in a limited area. The committee felt hampered by the lack of technical information..

Committee Vote:

Moved: John Foster		Second: Tina Ellor		
Yes: 14	No: 0	Abstain: 0	Absent: 0	Recusal: 0

**National Organic Standards Board
Crops Committee
2012 Sunset Recommendation
Pheromones**

April 29, 2011

List: §205.601 Synthetic substances allowed for use in organic crop production.

(f) As insect management. Pheromones.

Summary

Pheromones were approved for listing in 1995. In 2002, the board voted to allow List 3 inerts used in passive pheromone dispensers, through approval of the following annotation:

Pheromones -includes only EPA-exempt pheromone products, EPA-registered pheromone products with no additional synthetic toxicants unless listed in this section, and any inert ingredients used in such pheromone formulations that are not on EPA List 1 (Inerts of toxicological concern) or EPA List 2 (Potentially toxic inerts), *Provided* the pheromone products are limited to passive dispensers. Pheromone products containing only pheromones, active ingredients listed in this section, and List 4 inerts may be applied without restriction.

The Crops Committee requested, but did not receive, a Technical Review (TR) for pheromones. Although the committee was concerned about making a decision about a diverse class of materials without adequate technical information, especially knowing that there have been problems with pheromone product ingredients —such as those used for the light brown apple moth— the committee wants to preserve the use of these products, which have become essential to organic fruit growing. There was discomfort around the issue of List 3 inerts being allowed ingredients in a permitted substance, but the committee trusts that the inerts task force will be able to update and clarify the limitation on inerts in National List substances, and the board will be able to address this issue when inerts come up for review.

The Crops Committee struggled with trying to define a class of pheromones it felt comfortable approving as a class, and originally recommended approving pheromone products that are in passive dispensers, that have no added toxicants, and that have inerts approved by this board. Passive dispensers are those which emit pheromones by volatilization rather than by spray and produce a concentration of pheromones in a limited area. Eventually, after hearing public comment and failing to receive technical input in the form of a TR, and in an effort to emphasize the committee's desire to control

inerts present in formulations allowed, the committee proposed to restrict the pheromone products to those with approved inert ingredients.

Committee Recommendation

The Crops Committee recommends the continued listing of pheromones for insect management with the addition of an annotation that limits their formulations to those with only approved inert ingredients. The motion was to amend the current listing of pheromones to read: "(f) As insect management. Pheromones, provided that they are formulated with only approved inert ingredients."

Committee Vote

Motion: John Foster Second: Steve DeMuri
Yes: 6 No: 0 Absent: 1 Abstain: 0 Recuse: 0