

PACIFIC BIOCONTROL CORPORATION

The Market Leaders in Pheromone Mating Disruption

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To: United States Department of Agriculture (USDA)
Accredited Certifying Agents

February 28, 2018

Dear USDA Accredited, Certifying Agent:

The following information has been assembled in order to verify the current organic status of the pheromone mating disruption product, **ISOMATE® FBW Ring**, U.S. EPA Reg. No. 53575-45. This product fully meets the current National Organic Program (NOP) rules as a crop input for organic farming operations as determined by the U.S. EPA. All of the ingredients contained in this product qualify under the current NOP rules for organic crop production. The pheromone active ingredient qualifies under the NOP at 7 CFR Part 205.601 (f) "as insect management, pheromones." All other (inert) ingredients contained in the product are EPA List 3 materials that are allowed as inert ingredients under the NOP as per 7 CFR Part 205.601, paragraph (m), subpart (2) as follows:

- (m) As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.
- (2) EPA List 3 - Inerts of unknown toxicity - for use only in passive pheromone dispensers.

This product has been reviewed and approved for organic use by the reputable third party: U.S. EPA. **Attachment A** is a copy of a NOP memo that addresses this topic from the Deputy Administrator of the NOP, Mr. Miles McEvoy. This memo confirms that USDA Organic Certifying Agents may consult with reputable third-party sources (such as U.S. EPA, OMRI or WSDA Organic Food Program) to determine whether or not a crop input/product is in compliance with current NOP regulations. **Attachment B** includes a copy of the most current label for the product with the official "For Organic Production" logo.

The attached memo and label should assure any USDA accredited organic certifier that the pheromone mating disruption product, **ISOMATE FBW Ring**, is currently fully cleared for use on organic farms. If you have any questions, please contact me at my email below. Thank you.

Sincerely,

Kathy A. Bolan
Regulatory Consultant/Agent, Pacific Biocontrol Corporation
E-mail: kbolan@pacificbiocontrol.com

*Please reference U.S. EPA's Pesticide Registration Notice 2003-1 for the review and labeling of pesticide products under the NOP.



Policy Memorandum

To: Stakeholders and Interested Parties

From: Miles McEvoy, Deputy Administrator

Subject: Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations

Date: Revised – August 6, 2013. Original Issue Date – January 21, 2011.

Organic producers and handlers must provide a complete list of substances used in production and handling in their Organic System Plan (OSP). This list includes fertilizers, soil amendments, potting soil, crop production aids, and pest control materials used in crop production; livestock feed, feed supplements, feed additives, medications, and livestock production aids used in livestock production; and ingredients, processing aids, post-harvest handling substances, sanitizers, and facility pest control materials used in processing and handling. Accredited certifying agents must evaluate this list to determine compliance with U.S. Department of Agriculture (USDA) organic regulations and then communicate acceptance of the materials prior to organic producers and handlers using the materials.

The National Organic Program (NOP) allows certifying agents to recognize product reviews done by certain entities. These entities evaluate products for compliance with the USDA organic regulations and include: 1) other certifying agents; 2) the U.S. Environmental Protection Agency (EPA); and 3) material evaluation programs accredited to International Organization for Standardization (ISO) Guide 17065 (formerly ISO Guide 65). All certifying agents must verify that materials used by certified organic operations comply with the USDA organic regulations, including the National List of Allowed and Prohibited Substances, and any annotations provided therein. (See 7 CFR 205.601-606).

For branded (formulated) products, certifying agents have three options available for determining compliance:

1. Certifying agents can verify that the product complies by evaluating the product and all of the ingredients within the product (e.g., contacting the supplier/ formulator/ manufacturer to obtain full disclosure of the ingredients in the product);
2. Certifying agents may consult with another certifying agent who has evaluated the product and accept that certifying agent's determination of the product's compliance with the USDA organic regulations. The Washington State Department of Agriculture, as an accredited certifying agent, has a publicly available list of approved products available at <http://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.aspx>; and



3. Certifying agents may consult with a reputable third party source (e.g., EPA, or the Organic Materials Review Institute (OMRI)) that evaluates the product's compliance with the USDA organic regulations, and accept their determination. OMRI has a publicly available list of approved products available at <http://www.omri.org/omri-lists>.

In all cases, the certifying agent must maintain documentation to support its determinations about the status of product compliance with the regulations.

Products with Multiple Reviews

Some manufacturers may submit their products for review to more than one certifying agent or material evaluation program. In the majority of cases, certifying agents and material evaluation programs reach the same determination regarding the allowance or prohibition of a product. On rare occasions, certifying agents and material evaluation programs reach different conclusions on whether the product complies with the USDA organic regulations.

In a case where certifying agents and material evaluation programs reach different conclusions on the allowance of a product, the NOP must be notified for a final determination on proper application of the regulations according to the following steps:

1. When a certifying agent or material evaluation program concludes that a product may not comply with the regulations, and that product is allowed by another certifying agent or material evaluation program, the certifying agent or material evaluation program must notify the NOP at NOP.Guidance@ams.usda.gov.
2. The NOP will review information from both parties and determine whether the regulations have been properly applied. The NOP's determination will be limited to the application of the USDA organic regulations for generic materials; the NOP does not approve or endorse branded (formulated) input products.
3. If the NOP determines that the regulations have not been properly applied and, therefore, the product does not comply with the regulations, the NOP will instruct the certifying agent or material evaluation program to rescind its approval of the product.
4. The NOP will communicate the determination to all certifying agents and material evaluation programs with a timeline, if appropriate, for the discontinuation of product use by organic operations.

A decision made by certifying agents and reputable third party sources about the status of a branded (formulated) product remains in effect until the NOP notifies all certifying agents and material evaluation programs about the status of a material under the regulations.

Document Control: This document supersedes the original version, issued on January 21, 2011, and the revision, issued on October 31, 2011. This document also supersedes "Verification of



Materials Memo” dated March 5, 2008, and “Documented Source of Approved & Prohibited Materials for Use in Organic Operations” dated July 16, 2004. These documents are now obsolete.

LOT # _____

Attachment B



ISOMATE® FBW RING

**A MATING DISRUPTION FORMULATION FOR FILBERTWORM (*Cydia latiferreana*),
HICKORY SHUCKWORM (*Cydia caryana*).**

FOR ORGANIC PRODUCTION

ACTIVE INGREDIENTS:	
(E,E)-8,10-Dodecadien-1-yl Acetate	88.93 %
OTHER INGREDIENTS	11.07 %
TOTAL	100.00 %
1.16 g active ingredients per dispenser	

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID STATEMENT

IF ON SKIN	▪ Remove contaminated clothing.
OR	▪ Immediately rinse skin for 15-20 minutes using plenty of water.
CLOTHING:	▪ Contact a poison control center or doctor for treatment advice.
IF IN EYES:	▪ Hold eyes open, slowly and gently rinse with water for 15-20 minutes. If wearing contact lenses, rinse eyes for 5 minutes, remove contact lenses, then continue rinsing. ▪ Contact a poison control center or doctor for treatment advice.
HOT LINE NUMBER:	▪ Have the product container or label with you when contacting a poison control center or doctor, or going for treatment. You can call the poison control center at 1-800-222-1222. ▪ You may also contact Pacific Biocontrol at 1-800-999-8805 for additional information.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of this product.

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MADE IN JAPAN
EPA Est. No: 47265-JPN-01
EPA Reg. No: 53575-45

NET CONTENTS: 40 Dispenser Units
One dispenser contains 0.049 fl oz or 1.3 g
Total content of package: 1.96 fl oz or 52.0 g

ISOMATE® is a registered Trademark of Pacific Biocontrol Corporation.

DIRECTIONS FOR USE	
IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. It is CRITICAL that ISOMATE FBW RING is applied as directed.	
Crops	Pomegranates and other pome fruits; hazelnuts and other tree nut crops.
Target Pests	Filbertworm (<i>Cydia latiferreana</i>), hickory shuckworm (<i>Cydia caryana</i>).
Rate	Minimum of 20 dispensers per acre (0.87 fl oz or 23.1 g a.i. per application). Do not exceed 150 g a.i. (or 130 dispensers) per acre per year.
Application	Place dispensers on lateral branches in upper third of tree canopy. Apply dispensers uniformly in the treated area.
Timing	Apply prior to filbertworm emergence in the spring. Consult your local pest control advisor or Pacific Biocontrol representative for proper timing or estimated dispenser longevity in your area.
Note	Isomate FBW Ring suppresses mating of target pests. Immigration of mated female moths of this species from adjacent external sources of infestation will reduce the level of control. Manage by: <ul style="list-style-type: none"> a. Treatment of external sources of infestation with Isomate-FBW Ring. b. Treatment of external sources of infestation with an effective insecticide. c. Treatment of pheromone treated orchard with insecticide. <p>Areawide application is most effective. Supplementary applications of insecticide are advised when Isomate FBW Ring is used in orchards with high pest populations. All pests must be monitored so that timely intervention with insecticides is possible.</p>
STORAGE AND DISPOSAL	
Do not contaminate water, food or feed by storage or disposal.	
Pesticide Storage	Store in original unopened package in a dry location at temperatures below 40°F. To prevent contamination with food or feed, store only unopened product packages in cold storage facilities that are used for food or feed.
Pesticide Disposal	Wastes resulting from this product may be disposed of on site or at an approved waste disposal facility.
Container Handling	Nonrefillable container. Do not reuse or refill this container. Dispose of empty foil packet in the trash.

WARRANTY AND LIMITATION OF DAMAGES

The directions for use of this product are believed to be adequate and must be followed carefully. Pacific Biocontrol Corporation warrants that the product complies with the specifications expressed in this label. To the extent consistent with applicable law, Pacific Biocontrol Corporation makes no other warranties, and disclaims all other warranties, expressed or implied, including but not limited to warranties of merchantability and fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. To the extent consistent with applicable law, Pacific Biocontrol Corporation's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Pacific Biocontrol Corporation shall have no liability for damages (special, consequential or incidental) that result from handling, storage and use of this product, which is not in compliance with the label. Use of this product implies all directions of this label have been read carefully. Read all directions carefully.