

## **Crops Committee: Recommendations Concerning BHT and Other Inerts Used in Pheromone Formulations**

### **Key Points:**

- BHT is an EPA List 3 inert that is present in formulations of pheromones used for mating disruption of insect pests.
- The mating disruptors are crucial for organic management of several orchard pests and other pests.
- Two other petitions have been submitted for other List 3 inerts used with pheromones. (
- BHT serves as an anti-oxidant, and substantially enhances the longevity of the pheromones.
- Other List 3 inerts are used to prevent photodegradation of the pheromones.
- Current annotation regarding pheromones only mentions them as insect attractants and not mating disruptors.
- All three TAP reviewers recommended approval of BHT use in pheromone mating disruptors with restrictions.
- Crops Committee is addressing all of these issues by a recommendation to amend the current annotation regarding pheromones
- Crops committee voted 4-0 that BHT was synthetic
- Committee did not consider uses in livestock.

### **Committee Recommendations: Proposed Change to 205.601(f)**

“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 polymer dispensers. Pheromone products containing only pheromones, active ingredients listed in this section, and List 4 inerts may be applied at ~~any time and in any form.~~”

### **Additional Explanation**

- Committee did not recommend removal of dispensers at season's end (Two reviewers recommended removal, but only one placed dispenser removal in the suggested annotation).
- Committee refrained from using the word “plastic” because of the possibility future biodegradable dispensers.
- EPA regulates pheromone products with some pesticidal action (which includes mating disruptors).
- Pheromone products used for monitors are exempt, but cannot contain toxicants
- Sprayable (or “puffer”) dispensers could be used only with List 4 inerts).