

# **Panel Discussion**

Chlorpyrifos and the Legal Landscape of Pesticide Regulation

2018 Agricultural and Environmental Law Conference November 8, 2018

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Resistance Management for Sustainable Agriculture and Improved Public Health

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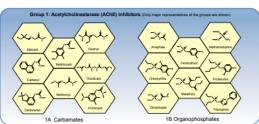
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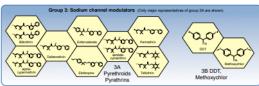
MODES OF ACTION

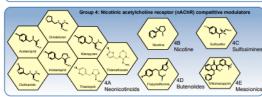
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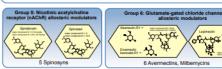
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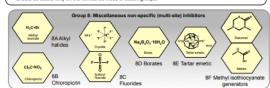




# Mode of Action Classification

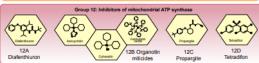
#### Insecticide Resistance Action Committee The Key to Resistance Management

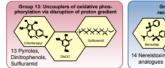
- Successive generations of a pest should not be treated with compounds from the same MoA Group. Not all of the current groupings are based on knowledge of a shared target protein. For further information please refer to the IRAC Mode of Action Classification do
- The color scheme used here associates modes of action into broad categories based on the physiological functions affected, as an ald to understanding symptomology, speed of action and other properties of the insecticides, and not for any resistance management purpose. Rotations for resistance management should be based only on the numbered mode of action groups.

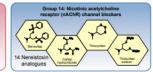


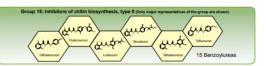


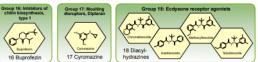


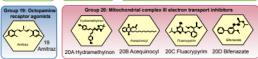




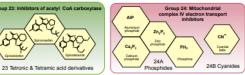


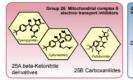
















22B

Semicarbazones



#### Targeted Physiology

Growth & Develop

- Use of Groups and Sub-Groups:

  A generation, sequencies or one sub-Arrendom of compounds between MoA groups induces selection for target site resistance.

  A generation, sequencies or one label, approy windows defined by crop general stage and peet biology.

  Several sprays of a compound may be possible within each pray window be used successive generations of a peet should not be treated with compounds from the same MoA group.

  Local separt adults a broad selection of the same MoA group.
- Actives in groups 8 (Miscellaneous non-specific multi-site inhibitors), 13 (Uncouplers) and UN are thought not to share a
- Bub props provide differentiation between compounds that may brind at the same target site but are structurally different enough the risk of metabotic cross-resistance is been than for close chemical analogs.
   Cross-resistance potential between sub-groups is higher than between groups, so cotation between sub-groups should be considered only when there are no alternatives, and only if cross-resistance does not exist. To believe ground with boat leaper tarboic. These unds that may bind at the same target site but are structurally different enough that close chemical analogs.
- exceptions are not sustainable, and alternative options should be sought
- exciptions all not sustainable, and alternative options should be cought; exciptions all not sustainable, and alternative options should be cought; subsequently and the control of many control of the control of many contro of clofentezine and is expected to have the same mode of action.

#### Poster Notes: - Groups 26 and 27 are unassigned.

 The poster is for educational purposes only. In our knowledge at the time of publication, but IRAC or its member companies cannot accept responsibility for how this information is used or interpreted. Advice should always be sought from local experts or advisors, and health and safety recommendations followed.



# **Insecticide Mode of Action Classification:**

A key to effective insecticide resistance management



Insecticide Resistance Action Committee

IRAC website: www.irac-online.org

#### Introduction

IRAC promotes the use of a Mode of Action (MoA) classification of insecticides as the basis for effective and sustainable insecticide resistance management (IRM). Insecticides are allocated to specific groups based on their target site. Reviewed and re-issued periodically, the IRAC MoA classification list provides farmers, growers, advisors, extension staff, consultants and crop protection professionals with a guide to the selection of insecticides or acaricides in IRM programs. Effective IRM of this type preserves the utility and diversity of available insecticides and acaricides. A selection of MoA groups is shown below.



# Effective IRM strategies: Alternations or sequences of MoA

All effective insecticide (and acaricide) resistance management (IRM) strategies seek to minimise the selection for resistance from any one type of insecticide or acaricide. In practice, alternations, sequences or rotations of compounds from different MoA groups provide sustainable and effective IRM. This ensures that selection from compounds in the same MoA group is minimised. Applications are often arranged into MoA spray windows or blocks that are defined by the stage of crop development and the biology of the pest(s) of concern. Local expert advice should always be followed with regard to spray windows and timings. Several sprays of a compound may be possible within each spray window but it is generally essential to ensure that successive generations of the pest are not treated with compounds from the same MoA group. Metabolic resistance mechanisms may give cross-resistance between MoA groups, and where this is known to occur, the above advice must be modified accordingly.

### Moulting & Metamorphosis

Group 18 Ecdysone agonist / disruptor
Diacylhydrazines (e.g. Tebufenozide)
Group 7 Juvenile hormone mimics
JH analogues. Fenoxycarb. Pyriproxyfen. etc



Group 11 Microbial disruptors of insect midgut membranes
Toxins produced by the bacterium Bacillus thuringiensis (Bt): Bt sprays and Cry proteins expressed in transgenic Bt crop varieties (specific cross-resistance subgroups)

### Nervous System

Groups 1A & B Acetylcholinesterase (AChE) inhibitors Carbamates and Organophosphates

Group 2 GABA-gated chloride channel antagonists
Cyclodienes OCs and Phenylpyrazoles (Fiproles)
Group 3 Sodium channel modulators

DDT, pyrethroids, pyrethrins

Group 4A Acetylcholine receptor (nAChR) agonists
Neonicotinoids

Group 5 nAChR agonists (Allosteric) [not group 4A] Spinosyns

Group 6 Chloride channel activators

Avermectins, Milbemycins

Group 22 Voltage dependent sodium channel blocker Indoxacarb

### Non-specific MoA

Group 9 Compounds of nonspecific mode of action (selective feeding blockers) Pymetrozine, Flonicamid, etc.



# **Cuticle Synthesis**

Groups 15 and 16 Inhibitors of chitin biosynthesis

Benzoylureas (Lepidoptera and others), Buprofezin (Homoptera)

### **Metabolic Processes**

Many groups acting on a wide range of metabolic processes including:

Group 12 Inhibitors of oxidative phosphorylation, disruptors of ATP

Diafenthiuron & Organotin miticides

Group 12 Uncouplers of oxidative phosphorylation via disruption of H proton gradient - Chlorfenapyr

# Non-specific MoA

Group 10 Compounds of non-specific mode of action (mite growth inhibitors) Clofentezine, Hexythiazox, Etoxazole

### Metabolic processes

Group 20 Mitochondrial complex III electron transport inhibitors Acequinocyl, Fluacrypyrim, etc Group 21 Mitochondrial complex I electron transport inhibitors Rotenone, METI acaricides Group 23 Inhibitors of lipid synthesis

Tetronic acid derivatives



Resistance Management for Sustainable Agriculture and Improved Public Health

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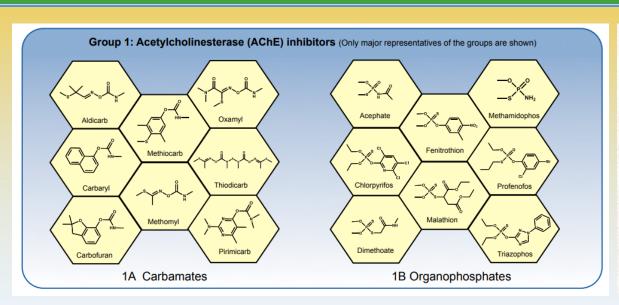
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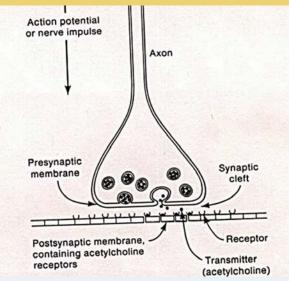
**CROPS** 

MODES OF ACTION

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# Nervous System

Groups 1A & B Acetylcholinesterase (AChE) inhibitors

Carbamates and Organophosphates

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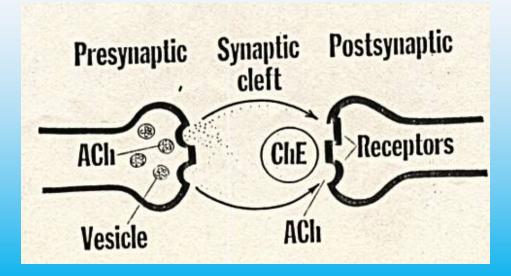
Spinosyns

Group 6 Chloride channel activators

Avermectins, Milbemycins

Group 22 Voltage dependent sodium channel blocker

Indoxacarb



# Specimen Label

# RESTRICTED USE PESTICIDE

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.



**Dow AgroSciences** 



# **INSECTICIDE**

®Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

For control of listed insects infesting certain field, fruit, nut, and vegetable crops.

Group	1B	INSECTICIDE
Active Ingredient: chlorpyrifos: O,O-dieth phosphorothioate	yl-O-(3,5,6-trichloro-2-py	yridinyl) 44.9%
Other Ingredients Total		55.1%
Contains 4 lb of chlorpyri Contains petroleum distil		

#### **Precautionary Statements**

**Hazard to Humans and Domestic Animals** 

EPA Reg. No. 62719-220

### WARNING

May Be Fatal If Swallowed • Harmful If Absorbed Through Skin • Causes Moderate Eye Irritation

Avoid contact with skin, eyes or clothing.

Table 2. EPA Screening Level Estimates of Agricultural Uses of Chlorpyrifos (059101).\*\*

	Crop	Lbs.A.I.		Crop	Lbs.A.I.
	110.10	100.000	32	Oranges	300,000
2	Alfalfa	400,000	33	Peaches	70,000
-	Almonds	500,000	34	Peanuts	200,000
3	Apples	400,000	35	Pears	30,000
4	Apricots +	4,000	36	Peas, Green	<500
5	Artichokes +	<500	37	Pecans	300,000
6	Asparagus	20,000	38	Peppers	2.000
7	Avocados +	3,000	39	Pistachios	10.000
8	Beans, Green	3,000	40	Plums	10,000
9	Broccoli	90,000	41	Potatoes +	4,000
10	Brussels Sprouts *	6,000	42	7.51777.73	
11	Cabbage	10,000	64000	Prunes	30,000
12	Cantaloupes +	3,000	43	Pumpkins	2,000
13	Carrots	1,000	44	Seed Crops (NPUD'02)	1,000
14	Cauliflower	20,000	45	Sod (NPUD'02)	2,000
15	Cherries	60,000	46	Sorghum	30,000
16	Chicory * +	<500	47	Soybeans	700,000
17	Com	3,000,000	48	Spinach +	1,000
18	Cotton	200,000	49	Squash +	1,000
19	Cranberries (NPUD'02)	50,000	50	Strawberries	9,000
20	Cucumbers	3,000	51	Sugar Beets	100,000
21	Dry Beans/Peas	4,000	52	Sunflowers	20,000
22	Figs *	5,000	53	Sweet Com	100,000
23	Grapefruit	60,000	54	Sweet Potatoes (NPUD'02)	100,000
24	Grapes	100,000	55	Tangelos	2,000
25	Hazelnuts (Filberts)	7,000	56	Tangerines	6,000
26	Lemons	90,000	57	Tobacco	100,000
27	Lettuce +	4,000	58	Tomatoes +	1,000
28	Mint (NPUD'02)	50,000	59	Walnuts	400,000
29	Nectarines	20,000	60	Watermelons +	1,000
30	Olives * +	<500	61	Wheat	300,000

#### SLUA data sources include:

USDA-NASS (United States Department of Agriculture's National Agricultural Statistics Service)-2001 to 2006.

Private Pesticide Market Research - 2001 to 2006.

NPUD 2002 (National Pesticide Use Database) of the CropLife America Foundation California DPR data – 2000 - 2006.

These results reflect amalgamated data developed by the Agency and are releasable to the public. N/C = Not Calculated.

+ = These crops were not known to be listed on active end use product registrations when this report was run.

\*\*Source: EPA Registration Review Docket, March 18, 2009



# SAFETY DATA SHEET

DOW AGROSCIENCES LLC

Product name: LORSBAN™ 4E Insecticide Issue Date: 05/15/2015
Print Date: 06/04/2015

#### 11. TOXICOLOGICAL INFORMATION

Toxicological information appears in this section when such data is available.

#### Acute toxicity

#### Acute oral toxicity

Moderate toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury. Observations in animals include: Tremors.

As product: Single dose oral LD50 has not been determined. LD50, Rat, 300 mg/kg Estimated.

#### Acute dermal toxicity

Prolonged or widespread skin contact may result in absorption of potentially harmful amounts.

As product: The dermal LD50 has not been determined. Based on information for component(s):

LD50, Rabbit, > 1,000 mg/kg

Permethrin (Pounce)

# **Acute Oral LD50 of Common Insecticides**

Acute Of all LD30 of Col	HILLOH HISECTICIO
Acephate (Orthane)	980
Bifenthrin (Capture)	375
Cyfluthrin (Baythroid)	826
Chlorpyrifos (Lorsban)	300 (96-270)
Carbaryl (Sevin)	246-283
Imidacloprid (Admire)	450
Malathion	2800
Daws at levies (Daves as)	2245

2215

# **Hazard Indicators / Signal Words**

Signal Word	DANGER- POISON	WARNING	CAUTION
Oral LD 50	0 - 50	50 - 500	>500

# Lorsban 4E $LD_{50} = 300$

 $LD_{50} = 300^{mg/kg}$ 

I weigh 185<sup>lbs</sup> – What's a lethal dose of Lorsban?

185 lbs./2.2 kgs/lb. = 84 kgs

 $300^{\text{mg/kg}} \times 84^{\text{kgs}} = 25,200^{\text{mgs}}$  (50+ Tylenol size tablets)

25.20gms/28.35gms/oz. = .889ozs

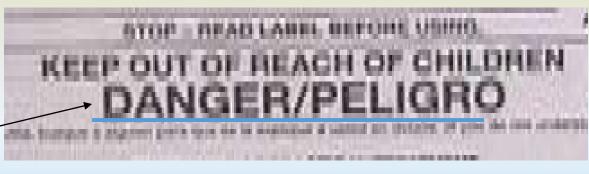
.17ozs =  $1^{tsp}$  (6 tsp/oz.)

 $.889^{ozs}/.17^{ozs/tsp} = 5.23^{tsp}$ 

# **Hazard Indicators / Signal Words**

Signal Word	DANGER- POISON	WARNING	CAUTION
Oral LD 50	0 - 50	50 - 500	>500









# SAFETY DATA SHEET

DOW AGROSCIENCES LLC

Product name: LORSBAN™ 4E Insecticide Issue Date: 05/15/2015

Print Date: 06/04/2015

#### Chlorpyrifos

Biodegradability: Biodegradation under aerobic laboratory conditions is below detectable

limits (BOD20 or BOD28/ThOD < 2.5%).

10-day Window: Fail Biodegradation: 22 % Exposure time: 28 d

Method: OECD Test Guideline 301D or Equivalent

Biological oxygen demand (BOD)

Incubation Time	BOD
5 d	0.000 %

#### Water solubility

Literature emulsifiable

Stability in Water (1/2-life) Hydrolysis, half-life, 72 d

Photodegradation

Test Type: Half-life (indirect photolysis)

Sensitizer: OH radicals

Atmospheric half-life: 1.4 Hour

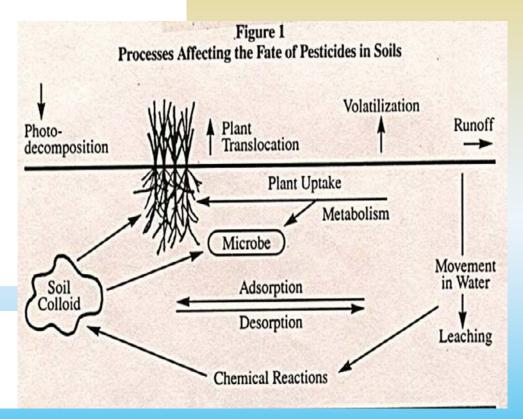
Method: Estimated.

#### Mobility in soil

#### Chlorpyrifos

Expected to be relatively immobile in soil (Koc > 5000).

Partition coefficient(Koc): 8151



BREET LIBERTS

Vineyard Team

Table 3.4. Most Commonly Used Conventional Pesticide Active Ingredients in the Agricultural Market Sector in 2012, and their Rankings and Usage Rate Range in 2012, 2009, 2007, and 2005 Estimates (Ranked by Range<sup>‡</sup> in Millions of Pounds of Active Ingredient)

A ation Toront diams	т	2012		2009		2007*		2005*	
Active Ingredient	Туре	Rank	Range	Rank	Range	Rank	Range	Rank	Range
Glyphosate	Н	1	270-290	1	209-229	1	170-190	1	147-167
Atrazine	Н	2	64-74	2	59-69	2	70-80	2	66-76
Metolachlor-S	Н	3	34-44	6	24-34	4	27-37	5	25-35
Dichloropropene	Fum	4	32-42	4	27-37	6	24-34	4	28-38
2,4-D	Н	5	30-40	5	24-34	7	22-32	7	21-31
Metam	Fum	6	30-40	3	30-40	3	48-58	3	36-46
Acetochlor	Н	7	28-38	7	23-33	5	25-35	6	24-34
Metam Potassium	Fum	8	16-26	8	14-24	13	6-10	_	0-3
Chloropicrin	Fum	9	8-18	9	6-16	9	5-15	10	5-15
Chlorothalonil	F	10	6-16	11	6-10	12	6-10	13	6-10
Pendimethalin	Н	11	6-16	10	6-16	10	6-10	9	5-15
Ethephon	PGR	12	7-11	12	6-10	11	6-10	11	7-11
Mancozeb	F	13	5-9	16	3-7	19	3-7	16	5-9
Chlorpyrifos	I	14	4-8	13	5-9	14	6-10	15	5-9
Metolachlor	Н	15	4-8	22	1-5	_	0-4	_	0-3
Hydrated Lime	F	16	3-7	15	4-8	20	2-6	_	1-5
Propanil	Н	17	3-7	17	3-7	18	3-7	18	3-7
Dicamba	Н	18	3-7	25	1-5	_	1-5	22	1-5
Trifluralin	Н	19	3-7	18	3-7	17	4-8	14	6-10
Decan-1-ol	PGR	20	3-7	_	1-5	_	1-5	_	0-4
Copper Hydroxide	F	21	3-7	20	2-6	15	5-9	12	7-11
Acephate	I	22	2-6	_	1-5	22	1-5	23	1-5
Paraquat	Н	23	2-6	_	1-5	25	1-5	24	1-5
Methyl Bromide	Fum	24	2-6	14	5-9	8	8-18	8	9-19
Glufosinate	Н	25	2-6	_	1-5	_	1-5	_	0-4

Sources: Agricultural Market Research Proprietary Data, (2007, 2009, and 2012).

USDA/NASS Quick Stats (http://www.nass.usda.gov/Quick\_Stats/)



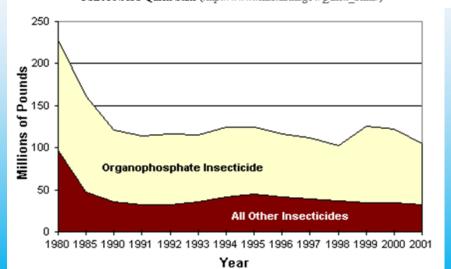
Table 3.7. Organophosphate Insecticide Active Ingredients Usage in the United States All Market Sectors, 2000-2012 Estimates

37	All Insecticides <sup>1</sup>	Organophosphate Insecticides		
Year	Mil lbs	Mil lbs	% of All Insecticides	
2000	99	70	71	
2001	102	54	53	
2002	90	47	52	
2003	84	41	48	
2004	77	40	52	
2005	69	33	48	
2006	66	30	46	
2007	64	27	42	
2008	65	28	43	
2009	60	23	38	
2010	56	21	38	
2011	56	22	39	
2012	60	20	33	

Source: Agricultural Market Research Proprietary Data (2000-2012).

Non-Agricultural Market Research Proprietary Data (2000-2012)

USDA/NASS Quick Stats (http://www.nass.usda.gov/Quick\_Stats/)



U.S. Environmental Protection Agency

3. 2008 - 2012 Usage

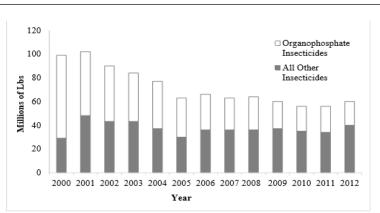
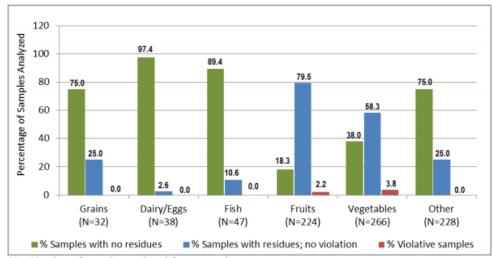


Figure 3.3. Total Amount of Organophosphate and All Other Insecticide Active Ingredients Usage in the United States in All Market Sectors, 2000–2012

# Pesticide Residue Monitoring Program Fiscal Year 2015 Pesticide Report

# U.S. Food and Drug Administration





N = Number of samples analyzed for commodity group







FDA Market Basket Report 2014
Frequency of Pesticide Residues
in Total Diet Study

Chlorpyrifos - 7.4% 0.0001-0.177 ppm N-Sample Size 1061 Items

FDA Tolerance for acceptable level varies for specific commodity from 0.01 to 13.0 ppm

Referenced EPA 40 FR 29715 180.342

The Second Edition of the 20volume Oxford English Dictionary contains full entries for 171,476 words in current use

The Library of Congress is the largest library in the world, with more than 158 million items on approximately 838 miles of bookshelves:

Be

20

Ca

38

Sr

88

89

91

93

94

95

96

Na

Rb

Cs

CAS REGISTRY is the most authoritative collection of disclosed chemical substance information, containing more than 89 million organic and inorganic substances and 65 million sequences

Dу

98

99

100

101

He 10

Ne

18

36

54

Xe

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102

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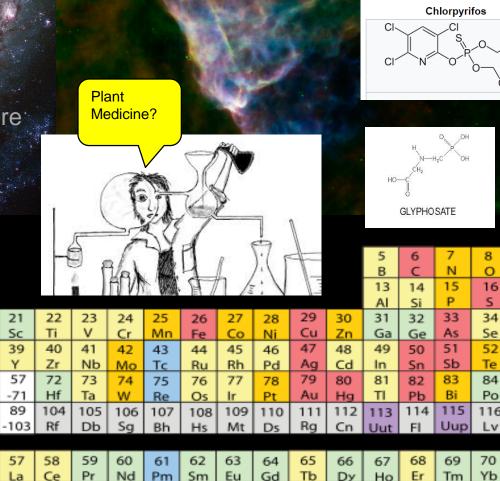
CI

Br

At

Lu

103





# **Panel Discussion**

Chlorpyrifos and the Legal Landscape of Pesticide Regulation

# Questions?

Ronald David Myers Extension Educator, Agriculture myersrd@umd.edu

