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**AGRICULTURE LAW
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Panel Discussion

Chlorpyrifos and the Legal Landscape of Pesticide Regulation

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UNIVERSITY OF
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EXTENSION

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

Midgut

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 sub-groups)

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 non-specific 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

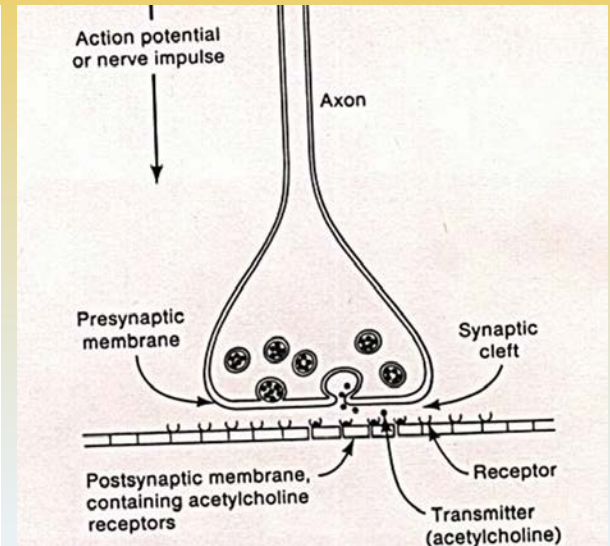
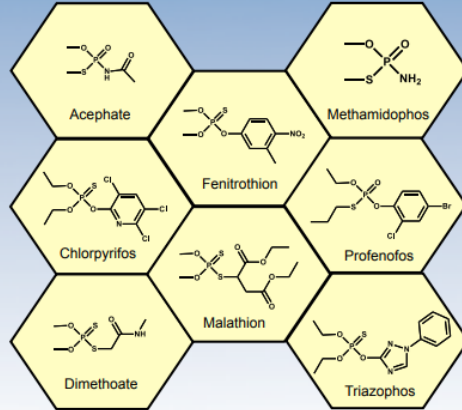
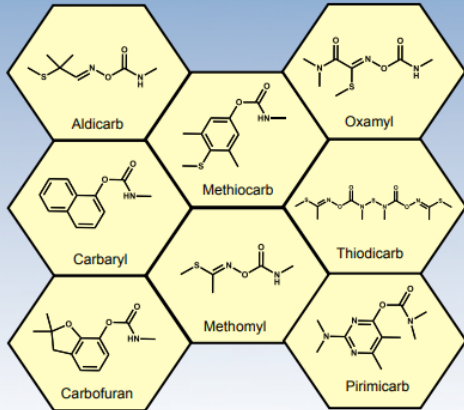
Non-specific MoA

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

Metabolic processes

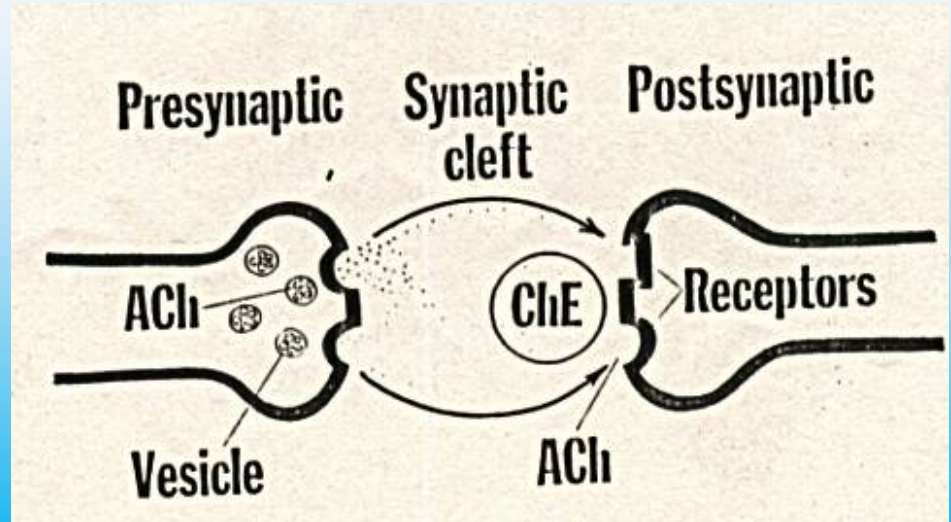
Group 20 Mitochondrial complex III electron transport inhibitors
 Acequinocyl, Flucyprym, etc
Group 21 Mitochondrial complex I electron transport inhibitors
 Rotenone, METI acaricides
Group 23 Inhibitors of lipid synthesis
 Tetrionic acid derivatives

Group 1: Acetylcholinesterase (AChE) inhibitors (Only major representatives of the groups are shown)



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



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

Lorsban®-4E

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
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Active Ingredient:

chlorpyrifos: O,O-diethyl-O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate..... 44.9%

Other Ingredients..... 55.1%

Total..... 100.0%

Contains 4 lb of chlorpyrifos per gallon.

Contains petroleum distillates.

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

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

Crop	Lbs.A.I.	Crop	Lbs.A.I.
1 Alfalfa	400,000	32 Oranges	300,000
2 Almonds	500,000	33 Peaches	70,000
3 Apples	400,000	34 Peanuts	200,000
4 Apricots +	4,000	35 Pears	30,000
5 Artichokes +	<500	36 Peas, Green	<500
6 Asparagus	20,000	37 Pecans	300,000
7 Avocados +	3,000	38 Peppers	2,000
8 Beans, Green	3,000	39 Pistachios	10,000
9 Broccoli	90,000	40 Plums	10,000
10 Brussels Sprouts *	6,000	41 Potatoes +	4,000
11 Cabbage	10,000	42 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 Corn	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 Corn	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

Hazard Indicators / Signal Words

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

Lorsban 4E LD₅₀ = 300

LD₅₀ = 300mg/kg

I weigh 185^{lbs} – What's a lethal dose of Lorsban?

$$185 \text{ lbs.} / 2.2 \text{ kgs/lb.} = 84 \text{ kgs}$$

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

$$25.20 \text{ gms} / 28.35 \text{ gms/oz.} = .889 \text{ ozs}$$

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

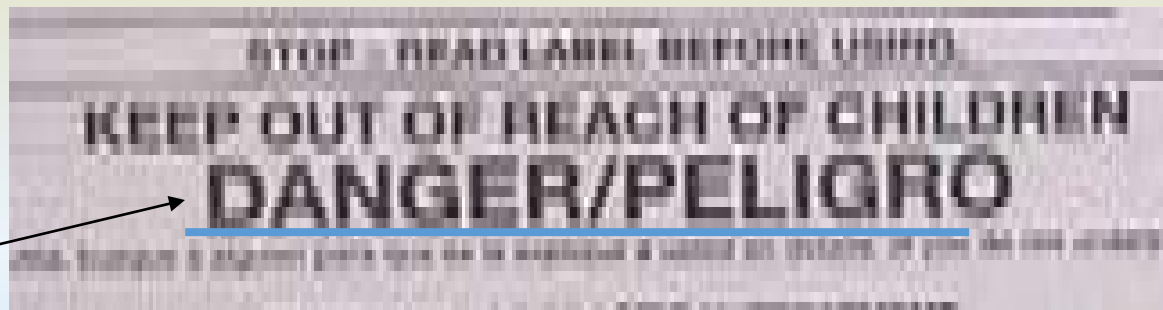
$$.889 \text{ ozs} / .17 \text{ ozs/tsp} = 5.23 \text{ tsp}$$

Acute Oral LD50 of Common Insecticides

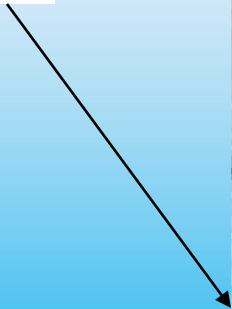
Acephate (Orthane)	980
Bifenthrin (Capture)	375
Cyfluthrin (Baythroid)	826
Chlorpyrifos (Lorsban)	300 (96-270)
Carbaryl (Sevin)	246-283
Imidacloprid (Admire)	450
Malathion	2800
Permethrin (Pounce)	2215

Hazard Indicators / Signal Words

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



**Signal
Words**



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Product name: LORSBAN™ 4E Insecticide

Issue Date: 05/15/2015

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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

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

Figure 1
Processes Affecting the Fate of Pesticides in Soils

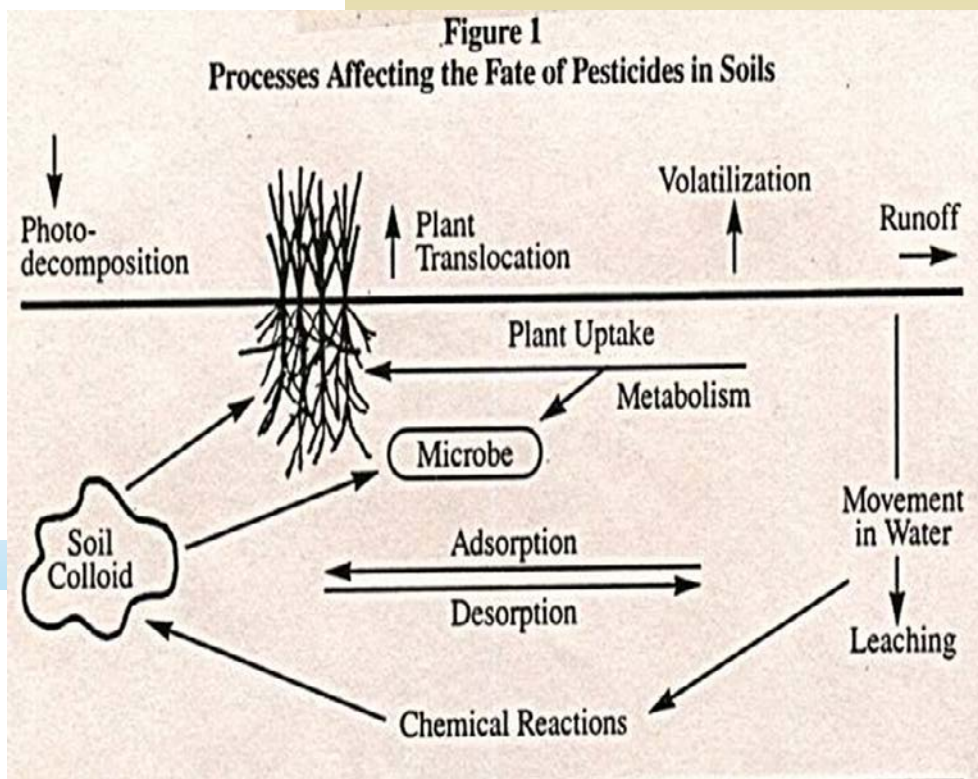


Table 3.4. Most Commonly Used Conventional Pesticide Active Ingredients in the Agricultural Market Sector in 2012, and their Rankings and Usage Rate Range in 2012, 2009, 2007, and 2005 Estimates (Ranked by Range² in Millions of Pounds of Active Ingredient)

Active Ingredient	Type	2012		2009		2007*		2005*	
		Rank	Range	Rank	Range	Rank	Range	Rank	Range
Glyphosate	H	1	270-290	1	209-229	1	170-190	1	147-167
Atrazine	H	2	64-74	2	59-69	2	70-80	2	66-76
Metolachlor-S	H	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	H	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	H	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	H	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	H	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	H	17	3-7	17	3-7	18	3-7	18	3-7
Dicamba	H	18	3-7	25	1-5	—	1-5	22	1-5
Trifluralin	H	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	H	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	H	25	2-6	—	1-5	—	1-5	—	0-4

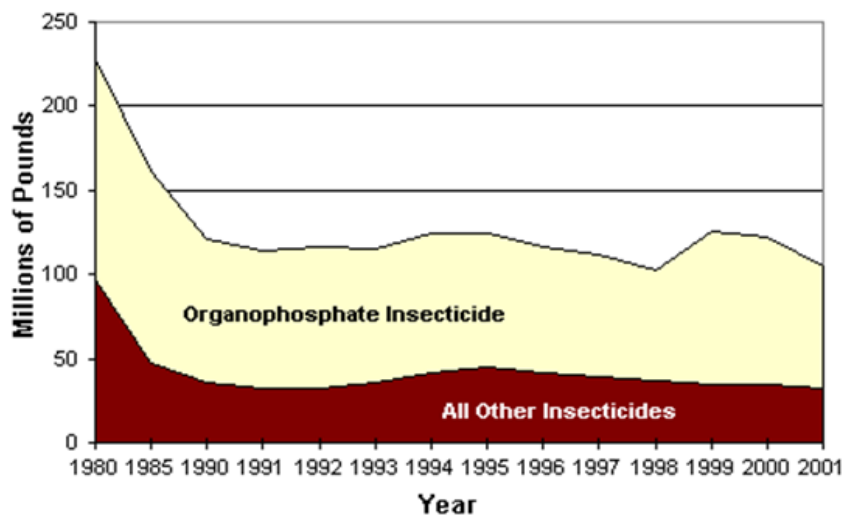
Sources: Agricultural Market Research Proprietary Data, (2007, 2009, and 2012).
 USDA/NASS Quick Stats (http://www.nass.usda.gov/Quick_Stats/)



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

Year	All Insecticides ¹	Organophosphate Insecticides	
	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

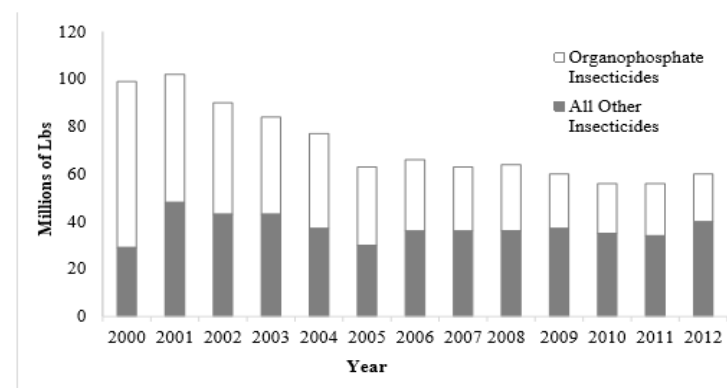


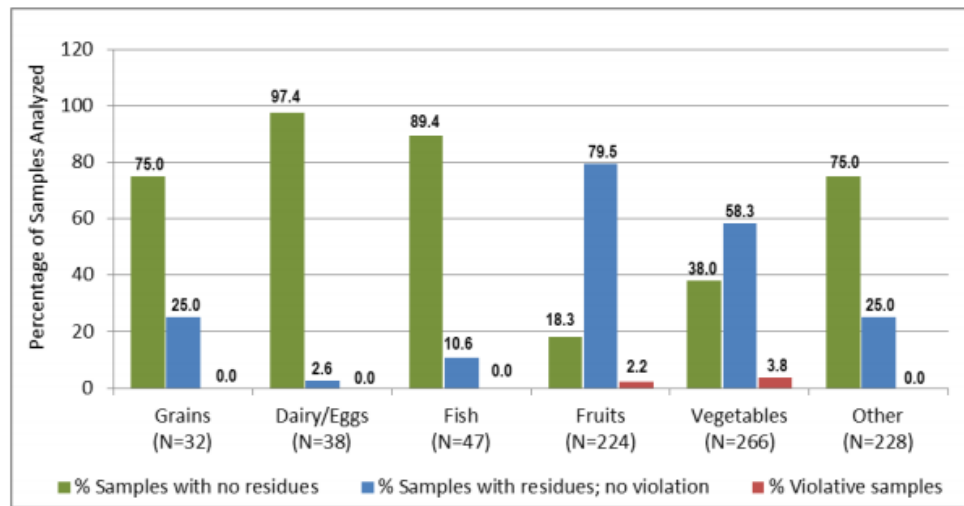
Figure 3.3. Total Amount of Organophosphate and All Other Insecticide Active Ingredients Usage in the United States in All Market Sectors, 2000–2012

Pesticide Residue Monitoring Program Fiscal Year 2015 Pesticide Report

U.S. Food and Drug Administration



Figure 1 - Results of Domestic Samples by Commodity Group



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



Stavropol, Russia





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Questions?

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