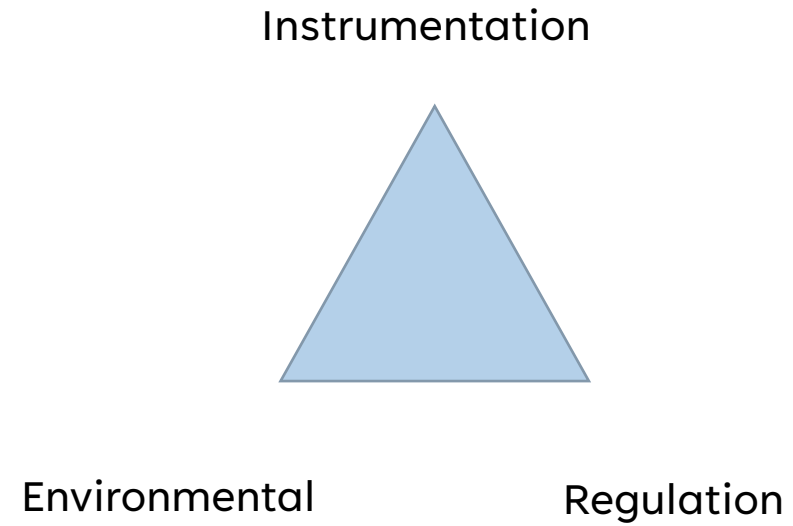




**CHALLENGES FACED BY
ENFORCEMENT LABS REGARDING
25B PRODUCTS**

INTRODUCTION

25B PRODUCT TESTING LIMITATIONS:



DEFINITIONS

Minimum risk pesticide: EPA has determined that certain “minimum risk pesticides” pose little to no risk to human health or the environment, EPA has exempted them from the requirement that they be registered under the Federal Insecticide, Fungicide, and Rodenticide Act...to focus resources on pesticides that pose greater risk to humans and the environment.

Code of Federal Regulations: “The pesticides or classes of pesticides listed in this section have been determined to be of a character not requiring regulation under FIFRA and are therefore exempt from all provisions of FIFRA when intended for use, and used, only in the manner specified.”

FOR THE LABORATORIES

NO FIFRA...

No analytical methods provided
by companies

No standards provided by
companies nor available from
the EPA repository

No target reporting limits
available relevant to the
environment



FIT FOR PURPOSE METHOD EXAMPLE

- Citric acid
- Calcium citrate
- Iron citrate
- Chelation structure with metals





FOR THE ENVIRONMENT

NO FIFRA...

No readily-available data regarding its current presence in the environment

No readily-available breakdown/metabolite/half-life data related to agriculture

No risk to humans and the environment, no tolerance requirements per 40 CFR 180.950

25B PRODUCT OVERVIEW – TECHNOLOGICAL CHALLENGES



LC/MS/MS

Potassium sorbate,
eugenol



ICP-OES

Zinc, Sodium Chloride



ANTIGEN-
ANTIBODY TEST

Blood



ION EXCHANGE
LC/UV

Citric acid , malic
acid



GC/MS

Essential oils



CONCLUSIONS

As 25b products fall outside of the FIFRA scope the problem of analyzing them is multi-faceted.

Even if previous challenges can be resolved the question has to be asked of who will provide funding for the 25b product testing.

If 25b product testing is important to regulators a working group should be set up that can answer these questions.

THANK YOU

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