PACIFIC BIOCONTROL CORPORATION

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To: United States Department of Agriculture (USDA)

Accredited Certifying Agents

September 22, 2016

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® PTB TT, EPA Reg. No. 53575-38. This product meets the National Organic Program (NOP) rules as a crop input for organic farming operations as determined by the U.S. EPA. As part of the review of this product for registration, the U.S. EPA reviewed all of the ingredients in ISOMATE® PTB TT as qualifying under the NOP rules for organic crop production and approved the attached label to display the official "For Organic Production" logo*.

This product has been reviewed and approved for organic use by the reputable third party: U.S. EPA. **Attachment A** is a copy of the latest NOP memo that addresses this topic, dated August 6, 2013, from the Deputy Administrator of the NOP, Mr. Miles McEvoy. This memo reconfirms earlier USDA memos 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 ISOMATE® PTB TT with the official "For Organic Production" logo.

This letter and the attached information should assure any USDA accredited organic certifier that the pheromone mating disruption product, ISOMATE[®] PTB TT, is cleared for use on organic farms. Please contact me, if you have any further questions about this. Thank you.

Sincerely,

Kathy A. Bolan

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

Attachment A



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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

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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



A MATING DISRUPTION FORMULATION FOR PEACH TWIG BORER (Anarsia lineatella) **▶** FOR ORGANIC PRODUCTION

ACTIVE INGREDIENTS:	
(E)-5-Decenyl acetate	47.84 %
(E)-5-Decen-1-ol	2.92 %
OTHER INGREDIENTS	49.24 %
TOTAL	100.00 %
268.98 mg active ingredients per dispenser	

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

FIRST AID STATEMENT

IF.	О	Ν	S

- KIN Remove contaminated clothing.
 - 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 eves open, slowly and gently rinse with water for 15-20 minutes. If wearing contact lenses, rinse eves 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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14615 NE 13th Court, Suite A, Vancouver, WA 98685 U.S.A. Telephone (360) 571-2247 or 1-800-999-8805 www.pacificbiocontrol.com

MADE IN JAPAN **NET CONTENTS**: 200 Dispenser Units EPA Est. No: 47265-JPN-01 One dispenser contains 0.021 fl oz or 529.90 mg EPA Reg. No: 53575-38 Total content of package: 4.15 fl oz or 105.98 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 PTB TT is applied as directed.

Crops	Peaches, nectarines, apricots, plums, prunes, cherries and other stone fruits; almonds and
	other tree nut crops.

Target Pests Peach twig borer (Anarsia lineatella)

Rate Minimum of 100 dispensers per acre (1.03 fl oz or 26.90 g a.i. per application). Maximum of 200 dispensers per acre (2.07 fl oz or 53.80 g a.i. per application). Do not exceed 150 g a.i. (or 558 dispensers) per acre per year.

Application Place dispensers in lateral branches in upper third of tree canopy.

Apply prior to peach twig borer emergence in the spring. Consult your local pest control Timing advisor or Pacific Biocontrol representative for proper timing or estimated dispenser longevity in your area.

Note Isomate PTB TT suppresses mating of target pest. Immigration of mated female moths of this species from adjacent external sources of infestation will reduce the level of control. Manage by:

- a. Treatment of external sources of infestation with Isomate PTB TT.
- b. Treatment of external sources of infestation with an effective insecticide.
- c. Treatment of pheromone treated orchard with insecticide

Areawide application is most effective. Supplementary applications of insecticide are advised when Isomate PTB TT is used in orchards with high pest populations. All pests must be monitored so that timely intervention with insecticides is possible.

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 Disposal Nonrefillable container. Do not reuse or refill this container. Dispose of empty foil

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.