

To: United States Department of Agriculture (USDA)
Accredited Certifying Agents

March 26, 2020

Dear USDA Accredited, Certifying Agent:

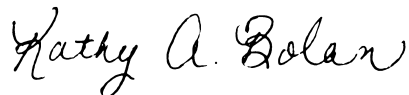
The following information has been assembled in order to verify the current organic status of the pheromone mating disruption product, **ISOMATE® FBW Ring**, U.S. EPA Reg. No. 53575-45. This product fully meets the current National Organic Program (NOP) rules as a crop input for organic farming operations as determined by the U.S. EPA. All of the ingredients contained in this product qualify under the current NOP rules for organic crop production. The pheromone active ingredient qualifies under the NOP at 7 CFR Part 205.601 (f) "as insect management, pheromones." All other (inert) ingredients contained in the product are EPA List 3 materials that are allowed as inert ingredients under the NOP as per 7 CFR Part 205.601, paragraph (m), subpart (2) as follows:

- (m) As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.
- (2) EPA List 3 - Inerts of unknown toxicity - for use only in passive pheromone dispensers.

This product has been reviewed and approved for organic use by the reputable third party: the U.S. EPA. **Attachment A** is a copy of the EPA's National Organic Program (NOP) review standards. This memo gives guidance on the U.S. EPA's role to assist the USDA by reviewing pesticides for compliance under the NOP's guidelines. When a pesticide is in compliance, then its label is allowed to use the official "For Organic Production" logo that identifies the pesticide as allowable for organic use. **Attachment B** is the current label for the product with this logo.

The attached memo and label should assure any USDA accredited organic certifier that the pheromone mating disruption product, **ISOMATE FBW Ring**, is currently fully cleared for use on organic farms. If you have any questions, please contact me at my email below. Thank you.

Sincerely,



Kathy A. Bolan
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Attachment A

EPA's National Organic Program

EPA's National Organic Program (NOP) was created to assist USDA's NOP in an effort "to facilitate commerce in food that is organically produced." EPA's participation is based on the understanding that organic agriculture also advances its own mission – "to protect human health and the environment." Specifically, EPA notes that pesticides allowed for organic use generally confer reduced risks to agricultural workers, consumers, and the environment.

The EPA NOP assists USDA by reviewing pesticides for compliance with the National Organic Standards established by USDA and by providing clear identification on pesticide labels of pesticide products allowable for organic use. EPA's program facilitates organic reviews for registrants, and provides distinct marketing advantages to pesticides whose labels indicate compliance with NOP standards. Moreover, EPA NOP's work makes it easier for agricultural workers to make organic determinations in the marketplace, and it allows USDA Organic Certifiers to more easily validate organic claims. Programmatic details of EPA NOP's work can be found in the following attached Pesticide Registration Notice: http://www.epa.gov/PR_Notices/pr2003-1.pdf

EPA NOP assists USDA NOP in other less obvious ways as well:

- EPA NOP provides scientific and technical consultation to USDA NOP regarding the character of pesticidal ingredients, with particular regard to human toxicology and ecological effect.
- EPA NOP provides USDA NOP with an expert review process that allows certifiers and consumers a measure of confidence in the bona fides of organic products.
- EPA NOP provides USDA NOP expedited reviews and consultation in cases that involve emergency exemptions, special local needs, or other unique circumstances.
- EPA NOP corresponds regularly with USDA certifiers (and third part certifiers) to help assure the integrity of organic claims made by pesticide products used in agricultural production.

A summary of EPA's NOP 'Review Standards' provides a snapshot of its work:

- EPA NOP reviews all NOP pesticide applications for compliance with PR Notice 2003-1 and 7 CFR Part 205. In doing this, EPA NOP considers: 1) the acceptability of the formulation(s) and manufacturing processes; 2) the appropriateness of the use pattern with regard to agricultural scope; and 3) the acceptability of the formulation and use vis-à-vis the 'Evaluation Criteria' laid out in 7 CFR Part 205.600.
- EPA NOP reviews active ingredients to assure that they are either non-synthetic and/or that they are unambiguously allowed per the National List.
- EPA NOP reviews all inert ingredients to assure that they are in compliance with USDA's regulations and policies for inert ingredients allowable for organic production. Generally, inert ingredients found on EPA's *List 4* of inerts prove eligible for organic use. EPA's *List 4* is published on the EPA website at <http://www.epa.gov/opprd001/inerts/lists.html>. (Notably, some inert ingredients have been removed from EPA's *List 4* since it was posted in August 2004, and EPA continues to revise its listing of inert ingredients.)
- EPA NOP requires organic review for all pesticide labels that make third party certification claims.
- EPA NOP reviews all NOP pesticide labels to assure that they contain only NOP approved language.

EPA's National Organic Program Contact Information:

Chris Pfeifer

Organic Labeling Liaison,

Biopesticides and Pollution Prevention Division, EPA

Ph# 703-308-0031

Email: pfeifer.chris@epa.gov

Attachment B

LOT # _____



ISOMATE® FBW RING

A MATING DISRUPTION FORMULATION FOR
FILBERTWORM (*Cydia latiferreana*),
HICKORY SHUCKWORM (*Cydia caryana*)
FOR ORGANIC PRODUCTION

ACTIVE INGREDIENTS:

(E,E)-8,10-Dodecadien-1-yl Acetate 88.93 %

OTHER INGREDIENTS 11.07 %

TOTAL 100.00 %

1.16 g active ingredient per dispenser

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

FIRST AID STATEMENT

IF ON SKIN OR CLOTHING:

- Remove contaminated clothing.
- Immediately rinse skin for 15-20 minutes using plenty of water.
- Contact a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eyes open, slowly and gently rinse with water for 15-20 minutes. If wearing contact lenses, rinse eyes 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.

PACIFIC BIOCONTROL CORPORATION

14615 NE 13th Court, Suite A, Vancouver, WA 98685 U.S.A.
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www.pacificbiocontrol.com

MADE IN JAPAN **NET CONTENTS:** 40 Dispenser Units
EPA Est. No: 47265-JPN-01 One dispenser contains 0.049 fl oz
EPA Reg. No: 53575-45 or 1.3 g
Total content of package: 1.96 fl oz or 52.0 g

ISOMATE® is a registered Trademark of Pacific Biocontrol.

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 FBW RING is applied
as directed.

Crops	Pomegranates and other pome fruits; hazelnuts and other tree nut crops.
Target Pests	Filbertworm (<i>Cydia latiferreana</i>), Hickory shuckworm (<i>Cydia caryana</i>).
Rate	Minimum of 20 dispensers per acre (0.87 fl oz or 23.1 g a.i. per application). Do not exceed 150 g a.i. (or 130 dispensers) per acre per year.
Application	Place dispensers on lateral branches in upper third of tree canopy. Apply dispensers uniformly in the treated area.
Timing	Apply prior to filbertworm emergence in the spring. Consult your local pest control advisor or Pacific Biocontrol representative for proper timing or estimated dispenser longevity in your area.

Note

Isomate FBW Ring 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:

- Treatment of external sources of infestation with Isomate FBW Ring.
- Treatment of external sources of infestation with an effective insecticide.
- Treatment of pheromone treated orchard with insecticide.

Areawide application is most effective. Supplementary applications of insecticide are advised when Isomate FBW Ring 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 packets in the trash.

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.