



Organophosphate Transition: Challenges to Stored Products

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Background Information

- In 1998 EPA proposed new risk mitigation strategies for phosphine
- USDA-OPMP established the USDA phosphine task force
- Industry coalitions were also formed



Background Information

- These various groups interacted with EPA
- Agreements reached on new risk mitigation measures
- Process led to increased interest regarding stored product pest management



Problems in Post-Harvest

- Already limited registrations of insecticides that can be used in various arenas
- Existing products are facing increased scrutiny
- Few options for new registrations



Current Issue: FQPA

- 1996 Food Quality Protection act
- Targets organophosphates with common modes of action (carbamates too)
- Some applications of minor-use products may be sacrificed to retain primary markets



Review Status of Stored-Product OPs

- Chlorpyrifos-methyl (Reldan)
- Pirimiphos-methyl (Actellic)
- Dichlorvos (Vapona, DDVP)



Chlorpyrifos-methyl (Reldan)

- Time lines
- Status
- Current philosophy and approach: "It's not over until its over"



Initial Stage

- 12/99 Public comment period completed
- 4/12/00 Conference call with users, registrants, scientists, EPA
- 4/14/00 Dow AgroSciences issues voluntary cancellation letter to EPA



Second Stage

- 4/28/00 Release of revised risks
- 6/01/00 Initiation of 60-day public comment
- 8/16/00 Dow and EPA begin negotiations on Reldan phase-out



Negotiations for Phase-Out

- EPA recommends 2 years continued use, 1 yr for depletion of existing stocks
- 12/20/00 Conference Call with various parties
- Further negotiations and rebuttals



Proposal for Final Agreement

- Sale of Reldan ceases on 12/31/03
- Final cancellation on 12/31/04
- The Reldan dust formulation will be off the market in the next several months
- 1/30/01 Voluntary cancellation agreement



Reldan Transition Strategy

- 3/29/01 First meeting in Kansas City
- Discussion with EPA, scientists, user groups, registrants
- 5/25/01 Meeting with USDA-OPMP, registrants, and EPA (part of ongoing process)



Primary Discussion Topics

- Possible extension of chlorpyrifos-methyl registration in Storicide (cyfluthrin + CM)
- Extension may be contingent on a viable replacement product registered by 12/31/04
- Storicide is now used on wheat in S. Dakota under Section 18, Section 3 label pending



Future Outcome?

- Interim risk management decision (IRED) issued, withdrawn temporarily for corrections
- As of now, the 01/31/01 voluntary agreement stands
- Conversations continue, other stakeholder meetings may be forthcoming



Pirimiphos-methyl (Actellic)

- Time lines and status
- Process of deliberations
- Seemingly fewer problems than with chlorpyrifos-methyl



Initial Stage

- 3/99 Public comment on preliminary risks
- 2/01/00 USDA and Land-grant University comments to EPA
- 2/15/00 USDA and Willfarm (registrant) meet with EPA, Willfarm to do additional tox work



Second Stage

- 3/29/00 Revised risk assessments released
- 4/20/00 USDA-OPMP sends out information regarding assessment and comments
- 5/31/00 Public comment period completed
- 6/00 Willfarm merges to become Agriliance



Final Stage

- 8/00 Interim Reregistration Eligibility Decision (IRED) date moved to fiscal 01
- 1/11/01 IRED conference call
- 1/19/01 USDA expresses concern regarding EPA requirements for closed system for mixing and loading for on-farm applications



Conclusion

- 2/08/01 USDA meets with EPA to discuss an inexpensive closed system for mixing
- 4/11/01 USDA arranges for demonstration
- EPA has stated that the system will be acceptable, IRED signed but not published



Dichlorvos (Vapona, DDVP)

- Time lines and status
- Used primarily in food warehouses, with the exception of stored peanuts in SE USA
- Chemical has been under discussion for 12-15 years



First stage

- 11/17/00 USDA-OPMP conference call
- 12/00 Public comment on preliminary risk assessments completed
- 1/31/01 Informal DDVP stakeholders group created



Second Stage

- AMVAC (technical and primary registrant) meets with EPA to discuss CalEPA approach for pest strips only
- Suggestions include retention of pest strip uses in residential unoccupied spaces and commercial applications
- 4/24/24 USDA Stakeholder conference call



Current Stage

- 5/17/2001 USDA Stakeholder meeting with EPA
- Issues discussed include role of DDVP in IPM programs, resistance management, food protection, and minor uses
- Technical briefing possible for October, triggers comment, IRED not until FY2002



Final Comments

- USDA-OPMP actively working with stakeholders and user groups
- Continued dialogue with EPA
- Need participation from users, trade associations, commodity groups, and pest management professionals to help with process



Contacts

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- Contact Ted to get e-mail distribution list for insecticides and other stored product issues



More Contacts and Resources

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