




# SFIREG

## STATE FIFRA ISSUES, RESEARCH AND EVALUATION GROUP

### MEMORANDUM

**DATE:** July 30, 2019

**TO:** Pesticide Regulatory Agencies in the United States, Territories, and Tribes

**FROM:** Liza Fleeson Trossbach, Chair   
State FIFRA Issues Research and Evaluation Group

**SUBJECT:** Clarification Regarding Pass-Through Pesticides in Animal Feed

In June 2017, the Vermont Agency of Agriculture brought the issue of a pass-through larvicide (diflubenzuron) that was being blended in animal feed in Vermont to the attention of the State FIFRA Issues Research and Evaluation Group (SFIREG). The purpose of placing diflubenzuron in animal feed is to prevent the development of fly larvae in manure, thus controlling fly populations in livestock and dairy operations. It was requested by Vermont that this issue, and the inappropriateness of this insecticidal use being classified as a feed additive or medicated feed, be sent to the US Environmental Protection Agency (EPA) for clarification.

Since Congress in 1975 amended the FIFRA definition of pesticide to exclude any article that is a new animal drug within the meaning of the Federal Food, Drug and Cosmetic Act (FFDCA), EPA and the Food and Drug Administration (FDA) have discussed how to best provide oversight for insect growth regulators mixed with animal feed for the purpose of preventing the development of fly larvae in manure. Currently, EPA considers insect growth regulators such as diflubenzuron mixed with animal feed for the purpose of controlling the development of fly larvae in manure to be pesticides; i.e., when insect growth regulators are mixed into animal feed with the intention that the insect growth regulator is to pass through the animal for the ultimate purpose of controlling insect or other pest populations in the animal's manure. Insect growth regulators intended to be used in this way must be registered and regulated as pesticides.

The sole purpose of this correspondence is to offer clarification related to this specific use of pesticides in animal feed for the control of immature and/or adult insects or other pests in manure. SFIREG encourages you to share this information with your Feed Control Officials.