



The AIC

Adjuvant and Inert Committee

Driven by Dynamic Change

What is it?

What does it work on?

Why should I be a member?



A bit of history ...

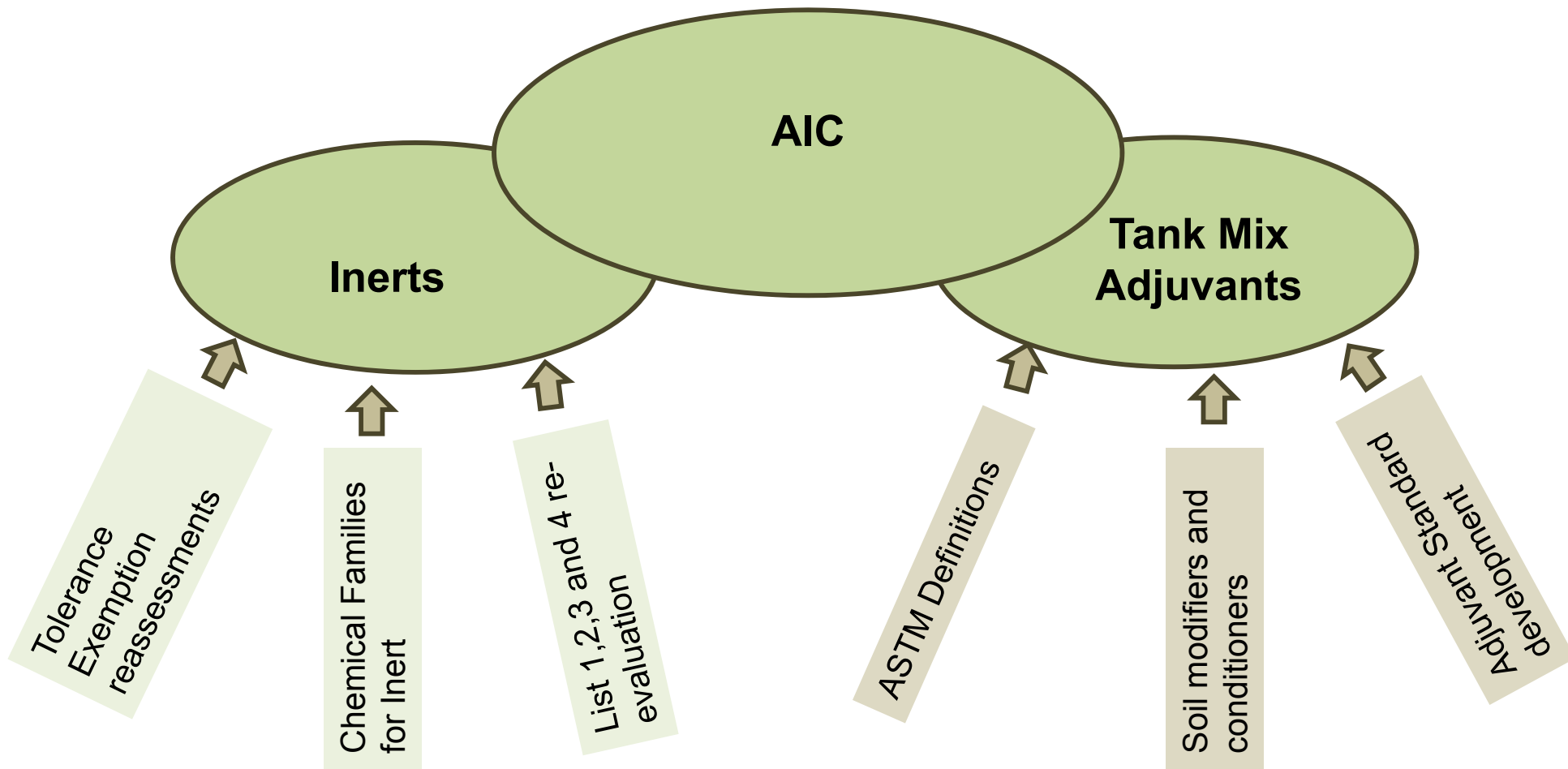
- In 1991 key members of CPDA wished to bring the Tank Mix Adjuvant segment into the domain of CPDA. This resulted in both adjuvant and inert companies being invited to form a new committee called the Adjuvant and Inerts Committee. This resulted in tremendous growth of the organization almost doubling the number of members.
- At this time No trade organization existed for surfactant/solvent/carrier (INERTS) companies in the Agricultural space
- EPA was beginning to focus on the role of the inert as they began to define “Pesticide” chemical” as all materials making up the formulation.
- In 1996 with the passage of FQPA (Food Quality Protection Act) all inert ingredients fell into the definition of “pesticide chemical”
 - “The term “pesticide chemical” means any substance that is a pesticide within the meaning of the Federal Insecticide, Fungicide and Rodenticide Act, including all active and **inert** ingredients of said pesticide. ¹
- Furthermore, discussions were taking place at EPA to evaluate Tank Mix adjuvants as related to the new FQPA terminology for residues of “pesticide chemicals”.

¹ Food Quality Protection Act Title IV, Sec 402(a) (q)(1)



Initial Issues and Structure

What did we start with...?





1991 to 2003 What did the AIC look like?

- Composed of Inert and Adjuvant Manufacturers
- Key early contributors included:

Inerts

Stepan

Croda

Albermarle

Witco (Akzo now
now)

Rhone-Poulenc (Solvay now)

ExxonMobil

Adjuvants

Helena

Chemorse

Wilbur Ellis

Agrilience (Winfield)



Today What does the AIC look like?

- Adjuvant and Inert Members make up 47% of the current CPDA membership
- This includes the following companies: (* indicates founding member)

Adjuvants Unlimited, LLC

AkzoNobel Surface Chemistry, LLC

*Chemorse Ltd.

Clariant Corporation

*Croda, Inc.

Lamberti

Ethox

Evonik Corp.

Exacto, Inc.

*ExxonMobil Chemical

Garrco Products

*Helena Agri-Enterprises

Huntsman Corporation

Ingevity

KALO

Momentive Performance Materials

Oleon

Oxiteno USA, LLC

Precision Laboratories, LLC

Rosen's

*Solvay USA, Inc.

*Stepan Company



Some Key Accomplishments in the Past

- **Defeated the issuance of Tolerance Fees for Inert Ingredients**
 - In June of 1999 EPA proposed mandatory tolerance fees with no guarantee of service
 - CPDA claims this fee was a new tax on the industry
 - With the passage of PRIA 1 tolerance fees were legislated out and fee for service was commissioned thereby giving the choice back to the company
- **Successfully lobbied for the Agricultural Tax Credit**
 - This allows for all improvements done on any facility manufacturing pesticide chemicals to take a \$2 Million tax credit on these improvements for security
 - This recently was re-approved
- **Provided for the formation of the Joint Industry Task Force (JITF)**
 - CPDA began this process and saw to it's formation
 - The JITF successfully navigated through the reapproval of inert ingredients using a chemical clusters approach
- **Fought off several times the Inert Disclosure issue**
 - This issue started by State's Attorney Generals and NWCAP to disclose inert ingredients on the label
 - CPDA fought and won based on the position that Confidential Statement of Formulas were protected under FIFRA
- **Established with EPA the framework for data compensation for Inert Ingredients**
 - EPA asked for assistance in the design of the model for data compensation for inert ingredients as allowed under FQPA
 - Working with EPA and the JITF implementation of the current system was achieved.
- **Establishment of the Adjuvant Standards**
 - A set of 16 standards was ratified and implemented for the certification process
 - Multiple companies and certifications have been given since the inception and the program continues to grow



More recent key events

- **AIC Conference**
 - Meeting started in Memphis in 1997.
 - Annual meeting ever since with growing numbers every year
 - Currently viewed as the only meeting dedicated to Adjuvants and Inerts Issues and a trademark of CPDA
- **DRT Task Force**
 - One of the oldest task forces in the CPDA and the AIC is the drift reduction task force
 - Though it has been an on again and off again battle with the Agency and industry it is still a very active force in the determination of the fitness for use of drift retardant tank mix adjuvants
 - Currently the task group is working on methods and measurements of various adjuvants with the designated spray nozzles used in EPA's protocol
 - The goal is to ADD the drift reduction adjuvant to the EPA star program for means of reducing spray drift



What can you do and why you should be a member?

- **Encourage membership**
 - CPDA can only grow through new members
 - You are the best recruiter we have
- **Submit issues and concerns to CPDA**
 - Surveys are good but only as good as the responses
 - If you have issues please bring them forward for the benefit of your company and the industry
 - The voice of the industry is more powerful than one voice
- **Engage your companies “Time and Talent”**
 - We need participants in the task groups and committee meetings
 - More ideas and discussion leads to better solutions
 - Be part of the solution
- **Participate in sponsorships and PAC activities**
 - Sponsorships are a great way to get your company visibility in the industry
 - Participating in the PAC promotes CPDA beyond our traditional advocacy programs and “makes friends”



Issues on the horizon

- **Transportation of Ethylene Oxide (EO)**
 - EO is used in all ethoxylated surfactants used by today's formulators
 - EO is only legally transported in rail cars
 - EO is extremely hazardous and could be reduced to pipeline movement only
- **Safer Choice program**
 - Could be extended to inert ingredients in pesticide
 - Currently blocked by FIFRA language
 - Strong push by environmentalists and retailers (e.g. Walmart) for safer choice ingredients in pesticides
- **Inert disclosure**
 - EPA continues to push for more disclosure either on SDS or Labels
 - Protection still in place from FIFRA
- **Continuous reclassification of hazards from REAcH data**
 - New information and studies continue to emerge for surfactants
 - As new information emerges companies are forced under GHS rules to amend SDS
- **Residues and tolerances for Adjuvants????**
 - NOT an issue at the moment
 - CPDA cooperated with CLA to deliver studies demonstrating no change in residues in the presence of adjuvants
 - Always is in the background at EPA