Agency of Agriculture Compost Talking Points May 2013.

In response to herbicide residuals in manure and compost causing injury to bedding plants the Vermont Agency of Agriculture has made all Aminopyralid and Clopyralid products with pasture or hay use sites on the label as Class "A" State Restricted Use products in Vermont. Classifying these products as restricted use institutes the requirement that any applicator be a licensed certified to purchase and use these products. This usage and sales are also tracked and recorded and must be made available to the Agency upon request. New label language on Aminopyralid products will make it possible to take enforcement against applicators or farmers that allow waste containing herbicide residue to be moved off the farm it was used on.

The Agencies investigation points toward the source of Aminopyralid found in Green Mountain Compost, to be from in state uses on grass hay and pasture.

- All of the uses investigated by the agency have been from legally obtained and used herbicide.
- New Label restrictions put in place by Dow Agrochemical will prevent future instances of Aminopyralid residues in Compost.
- Aminopyralid products are not widely used in Vermont the majority of the uses have occurred on pastures for horses or grass hay fields grown for horses.
- The Vermont Agency of Agriculture is in the process of getting information out to dealers about product status and aware of label restrictions
- New label restrictions ensure that if Aminopyralid is used on a farm the manure stays on the farm
- If a Composter needs information about a specific manure producer they Agency will provide that information.
- The Secretary would consider further restrictions if it is felt that they are an appropriate response.

Crops known to be sensitive to clopyralid, or aminopyralid

Beans	Carrots	Compositae family	
Cotton	Dahlias	Eggplant	
Flowers in general	Grapes	Legumes	
Lettuce	Marigolds	Mushrooms	
Peas	Peppers	Potatoes	
Roses, some types	Spinach	Sugar Beets	
Strawberries*	Sunflowers	Tobacco	
Tomatoes	Umbelliferae family	Vegetables, in general	

Active Ingredients, Manufacturers and Trade Names of Herbicides

Active Ingredient	Manufacturer	Trade Names
Clopyralid	Dow AgroSciences	Curtail, Redeem, R&P, Transline, Confront, Lontrel
Aminopyralid	Dow AgroSciences	Milestone, Forefront, Chaparrel

Residues of both Aminopyralid and Clopyralid were found in compost in Vermont. Aminopyralid is the herbicide that caused the issues with CSWD compost in 2012. Aminopyralid residues only come from pasture use or hay and subsequently horse manure; these uses have been eliminated in New England and New York. Based on the Agencies trace back investigation sampling results, potential sources of Clopyralid residues are mostly from out of state uses and include animal feed (grains), lawn clippings, and food waste primarily pasta and bread.

Range of herbicide residue detected in submitted samples, amount necessary in compost to cause plant injury and label and use information of four persistent herbicides^a.

Criteria	Picloram	Clopyralid	Aminopyralid	Aminocyclopyrachlor
Range detected ^b at	Trace	Trace - 623	Trace - 6.4	0
Testing Facility C	ppb	ppb	ppb	ppb
Levels Known to				
Cause Harm in	5 ppb	10 ppb	1 ppb	Unknown
Compost ^b				
Tolerance on Hay ^c	400,000 ppb	500,000 ppb	50,000 ppb	No food uses
Registered for use in VT	yes	yes	yes	no