Additional Information Request from NOSB (April 6, 2017)

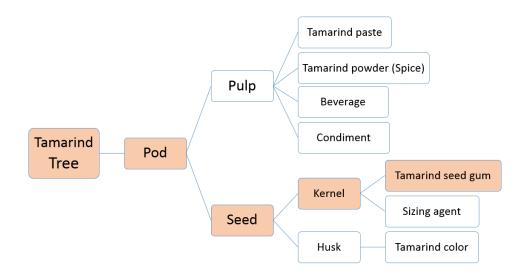
1. Supply Chain Limitations

There is limited information in the petition regarding the supply chain limitations for organic tamarind seeds. The petitioner should clarify and document that there are issues with either the quality or quantity of organic tamarind seeds available. Given that there are a number of suppliers of other organic tamarind products, why are organic tamarind seeds unavailable and what is the reason that organic tamarind seeds are not processed into an organic tamarind seed gum?

Response:

The fruit of the *Tamarindus indica L*. tree consists of a brown pod. The pod contains approximately 55% soft acidic pulp, 34 % seeds and 11% shell and fiber (Rao and Srivastava 1973). Tamarind seed gum (TSG) is manufactured from the tamarind seed. Seeds of the sour tamarind are obtained from the northern, northeastern, and central areas of Thailand and from southern and central India. No pesticides are applied during cultivation of these trees, which have strong natural resistance to infestation.

The black tamarind seeds are sieved and roasted. After cooling, the roasted seeds are placed in a rotary mixer, which removes black testa and the surface of the kernel powder. The remaining 70% is an off white kernel which is pulverized into tamarind kernel powder (TKP). DSP Gokyo Food & Chemical Co. Ltd purchases TKP from India and Thailand, the seeds from the TKP are also sourced from India and Thailand. TKP differs from the widely available tamarind powder. Tamarind powder (as is offered online as an organic ingredient) is obtained by drying and grinding the sticky pulp inside the pods. Tamarind powder can't be used as a raw material to manufacture TSG.



The tamarind tree can be a sweet or sour variety. The seeds of the sweet tamarind tree variety are too small to industrially produce TSG with a high quality or an acceptable yield, therefore only tamarind seeds from sour trees are used. Many commercial products are manufactured from the pulp and organic certified pulp is available due to consumer demand. However as highlighted below, consumer demand and the textile industry has never had a need for an organic certified sour seed. Thus, there is no supply chain established.

In India, a group certification program is employed based on the NPOP (National Programme for Organic Production). Organic certification is accredited by the governmental organization APEDA (The Agricultural and Processed Food Products Export Development Authority). Tamarind seeds are used mainly as a raw material for sizing agents for the textile industry and the highest quality seeds as used for the food industry to manufacture TSG.

There are several operators in India selling organic certified tamarind pulp which would mean that during growth and harvesting the entire pod including the seeds were organic certified. However, the manner in which seeds are sold in India doesn't allow for organic traceability. Seeds are collected throughout India and sold in local markets. Roasters purchase the seeds and remove the kernel for sale. The kernel is sold for TKP manufacturing in India.

In Thailand tamarind pulp is eaten as is or processed into condiments and beverages. Tamarind seeds are only used for the manufacture of TKP to manufacture TSG. DSP Gokyo is the only company purchasing TKP from Thailand. Additional labor is needed to collect the seeds for the manufacture of TKP. Therefore, most of the seeds from Thailand are discarded as waste material. Tamarind seeds are collected from wild tamarind trees spread across Thailand. Since collectors/operators are small-scale farmers they can't ensure a stable and sufficient supply alone. The above situation makes it difficult for organic certification.

The Organic agriculture in Thailand is in its infancy stage and the market size is small. http://ap.fftc.agnet.org/ap_db.php?id=734 The National Bureau of Agriculture Commodity and Food Standard (ACFS) works as an accreditation body, and the Department of Agriculture (DOA) works as the certification body. There is only one private certification body accredited by ACFS, named The Organic Agriculture Certification Thailand (ACT). We've been unsuccessful in contacting ACT on whether there is organic certified TKP in Thailand.

DSP Gokyo contacted many suppliers in India advertising organic tamarind seeds and organic TKP on the internet. We've had two responses, both suppliers couldn't supply organic certified TKP.

To add to this complexity, there are separate manufacturing plants for roasting and TKP production in India. TKP suppliers source from several roasters in India.

2. Manufacturing Process (Methyl Alcohol)

Are there alternatives to the use of methyl alcohol in the processing of the product that would meet organic standards?

Response:

There are no alternatives to methanol. The use of ethanol or isopropyl alcohol in place of methyl alcohol would result in TSG with a darker color and a higher residual content of protein and fat. The higher protein and fat content would impact the functionality and impair the dispersability of the powder.

3. Manufacturing Process (Inputs)

Describe further whether the non-agricultural inputs into the manufacturing process (methyl alcohol, sodium hydroxide, citric acid) are separated from the final product and if they change the chemical structure of the final product.

Response:

The chemical structure of TSG doesn't change during manufacture. The manufacturing process involves extracting the polysaccharide from the TKP.

Methanol: Methanol is removed to less than 50 ppm in the final products. The residual content of methanol is analyzed regularly by head-space gas chromatography. The representative analysis data of 5 lots is provided as follows:

Lot #	Methanol
	$(\mu g/g)$
16.09.05-1	9.1
16.09.07-1	11.9
16.09.10-2	13.9
16.09.11-1	13.5
16.09.12-3	8.2

Sodium hydroxide and citric acid: Sodium hydroxide (base) is neutralized with citric acid (acid) to generate sodium citrate (salt). Sodium citrate dissolves into the solution of methanol and the polysaccharide. In the dewatering process before drying, the methanol solution containing sodium citrate is separated from the polysaccharides. The ash content of the final product is around 0.4%, suggesting that sodium citrate is almost completely removed.

Methanol removes the water from the polysaccharides and this allows the polysaccharide molecules to form clumps which are too large to stay in solution. Sodium hydroxide works to remove the proteins from the polysaccharides by making the proteins solubilize into the solvent. Citric acid has no impact, as it is weak acid and added simply for neutralization.

4. Manufacturing Process (By-Products)

Describe the environmental impacts of the by-products from the manufacturing process of tamarind seed gum including the non-agricultural inputs added and the remaining solution after centrifugation.

Response:

Methanol: Methanol is not released into the air and has no environmental impact as the production line is sealed. Almost all of the methanol used is distilled and reused. The use of methanol is reported to the local government, emission standards are not set in their regulations.

Sodium hydroxide and citric acid: As described in Question 3, sodium citrate is generated by neutralization and dissolves into the solvent. The solvent containing sodium citrate is burnt in an incinerator and decomposed to CO₂, water and ash. These components are extremely small and don't impact the environment. The incinerator in the facility runs within the local government's emission standards.

Proteins, lipids and minerals which originated from the TKP: After the recovery of the methanol the protein, fat and minerals are burnt in an incinerator, and decomposed to CO_2 , water and incinerated residue. The amount of CO_2 and water are extremely small and don't impact the environment. Incinerated residue is non-toxic and disposal is completed by an outsourced industrial waste company. The incinerator in the facility runs within the emission standards.

Reference: Rao PS, Srivastava HC (1973). Industrial gums, Whistler RL, editor. Academic press

Analytical results of pesticides residues in tamarind seed polysaccharide

Analysis date: October 2005

Analysis facility: Food Analysis Technology Center SUNATEC

Sample: Glyloid 2A (hot water soluble product of tamarind seed polysaccharide)

Analysis Method: GC/MS, LC/MS/MS

No Items	Result (ppm)	determination	No	Items	Result (ppm)	determination
4 EDN	N.D.	(ppm)	50	CHLORREDODLIAM		(ppm)
1 EPN	N.D.	0.05		CHLORPROPHAM	N.D.	0.05
2 XMC	N.D.	0.05		CHLOROBENZILATE	N.D.	0.05
3 ACRINATHRIN	N.D.	0.05		SALITHION	N.D.	0.05
4 AZACONAZOLE	N.D.	0.05		CYANAZINE	N.D.	0.05
5 AZINPHOS-METHYL	N.D.	0.05		CYANOPHOS	N.D.	0.05
6 ACETOCHLOR	N.D.	0.05		DIETHOFENCARB	N.D.	0.05
7 AZOXYSTROBIN	N.D.	0.05		DICHLOFENTHION	N.D.	0.05
8 ATRAZINE	N.D.	0.05		DICLOBUTRAZOL	N.D.	0.05
9 ANILOFOS	N.D.	0.05		DICLOFOP-METHYL	N.D.	0.05
10 AMETRYN	N.D.	0.05		DICHLORAN	N.D.	0.05
11 ALACHLOR	N.D.	0.05		DICHLORVOS	N.D.	0.05
12 ALLIDOCHLOR	N.D.	0.05		DICOFOL	N.D.	0.05
13 ALLETHRIN	N.D.	0.05		DITHIOPYR	N.D.	0.05
14 ISAZOPHOS	N.D.	0.05		CYHALOTHRIN	N.D.	0.05
15 ISOFENPHOS	N.D.	0.05		CYHALOFOP-BUTYL	N.D.	0.05
16 ISOPROCARB	N.D.	0.05		DIPHENAMID	N.D.	0.05
17 ISOPROTHIOLANE	N.D.	0.05		DIPHENYLAMINE	N.D.	0.05
18 IPROVALICARB	N.D.	0.05		DIFENOCONAZOLE	N.D.	0.05
19 IPROBENFOS	N.D.	0.05		CYFLUTHRIN	N.D.	0.05
20 INDOXACARB	N.D.	0.05	71	CYFLUFENAMID	N.D.	0.05
21 UNICONAZOLE P	N.D.	0.05	72	CYPRODINIL	N.D.	0.05
22 ESPROCARB	N.D.	0.05	73	CYPERMETHRIN	N.D.	0.05
23 ETHALFLURALIN	N.D.	0.05	74	SIMAZINE	N.D.	0.05
24 ETHION	N.D.	0.05	75	SIMECONAZOLE	N.D.	0.05
25 EDIFENPHOS	N.D.	0.05	76	DIMETHAMETRYN	N.D.	0.05
26 ETOXAZOLE	N.D.	0.05	77	DIMETHIPIN	N.D.	0.05
27 ETHOPROPHOS	N.D.	0.05	78	DIMETHYLVINPHOS	N.D.	0.05
28 ETOBENZANID	N.D.	0.05	79	DIMETHENAMID	N.D.	0.05
29 ETRIMFOS	N.D.	0.05	80	DIMETHOATE	N.D.	0.05
30 ENDOSULFAN (α, β)	N.D.	0.05	81	DIMEPIPERATE	N.D.	0.05
31 OXADIAZON	N.D.	0.05	82	TERBACIL	N.D.	0.05
32 OXYFLUORFEN	N.D.	0.05	83	DIAZINON	N.D.	0.05
33 CADUSAFOS	N.D.	0.05		THIAZOPYR	N.D.	0.05
34 CAFENSTROLE	N.D.	0.05		THIOBENCARB	N.D.	0.05
35 CARFENTRAZONE-ETHYL	N.D.	0.05		THIFLUZAMIDE	N.D.	0.05
36 CARBOFURAN	N.D.	0.05		TECNAZENE	N.D.	0.05
37 QUINALPHOS	N.D.	0.05		TETRACHLORVINPHOS	N.D.	0.05
38 QUINOXYFEN	N.D.	0.05		TETRACONAZOLE	N.D.	0.05
39 QUINOCLAMINE (CAN)	N.D.	0.05		TETRADIFON	N.D.	0.05
40 QUINTOZENE	N.D.	0.05		THENYLCHLOR	N.D.	0.05
41 KRESOXIM-METHYL	N.D.	0.05		TEBUCONAZOLE	N.D.	0.05
42 CLOQUINTOCET-MEXYL	N.D.	0.05		TEBUFENPYRAD	N.D.	0.05
43 CLODINAFOP-PROPARGYL		0.05		TEFLUTHRIN	N.D.	0.05
44 CLOMAZONE	N.D.	0.05		DELTAMETHRIN	N.D.	0.05
45 CLOMEPROP	N.D.	0.05		TERBUTRYN	N.D.	0.05
46 CHLORTHAL-DIMETHYL	N.D.	0.05		TERBUFOS	N.D.	0.05
47 CHLORDANE	N.D.	0.05		TRIADIMENOL	N.D.	0.05
	N.D.				N.D.	
48 CHLORPYRIFOS		0.05		TRIADIMEFON		0.05
49 CHLORPYRIFOS-METHYL	N.D.	0.05		TRIAZOPHOS	N.D.	0.05
50 CHLORFENAPYR	N.D.	0.05		TRI-ALLATE	N.D.	0.05
51 CHLORFENVINPHOS	N.D.	0.05	102	TRIBUPHOS	N.D.	0.05

No Items	Result (ppm)	determination	No Items	Result (ppm)	determination
103 TRIFLURALIN	N.D.	(ppm) 0.05	154 FLUTOLANIL	N.D.	(ppm) 0.05
104 TRIFLOXYSTROBIN	N.D.	0.05	155 FLUVALINATE	N.D.	0.05
105 TOLCLOFOS-METHYL	N.D.	0.05	156 FLUFENOXURON	N.D.	0.05
106 NAPROPAMIDE	N.D.	0.05	157 FLUMIOXAZIN	N.D.	0.05
107 NITROTHAL-ISOPROPYL		0.05	158 FLUMICLORAC PENTYL	N.D.	0.05
108 PACLOBUTRAZOL	N.D.	0.05	159 PRETILACHLOR	N.D.	0.05
109 PARATHION	N.D.	0.05	160 PROCHLORAZ	N.D.	0.05
110 PARATHION-METHYL	N.D.	0.05	161 PROCYMIDONE	N.D.	0.05
111 HALFENPROX	N.D.	0.05	162 PROTHIOFOS	N.D.	0.05
112 PICOLINAFEN	N.D.	0.05	163 PROPACHLOR	N.D.	0.05
113 BIFENOX	N.D.	0.05	164 PROPAPHOS	N.D.	0.05
114 BIFENTHRIN	N.D.	0.05	165 PROPICONAZOLE	N.D.	0.05
115 PIPEROPHOS	N.D.	0.05	166 PROPYZAMIDE	N.D.	0.05
116 PYRACLOFOS	N.D.	0.05	167 PROPHAM	N.D.	0.05
117 PYRAZOPHOS	N.D.	0.05	168 PROFENOFOS	N.D.	0.05
118 PYRAFLUFEN ETHYL	N.D.	0.05	169 PROPOXUR	N.D.	0.05
119 PYRIDAFENTHION	N.D.	0.05	170 PROMECARB	N.D.	0.05
120 PYRIDABEN	N.D.	0.05	171 PROMETRYN	N.D.	0.05
121 PYRIBUTICARB	N.D.	0.05	172 BROMOBUTIDE	N.D.	0.05
122 PYRIMIDIFEN	N.D.	0.05	173 BROMOPROPYLATE	N.D.	0.05
123 PYRIMINOBAC-METHYL	N.D.	0.05	174 BROMOPHOS	N.D.	0.05
124 PIRIMIPHOS-METHYL	N.D.	0.05	175 HEXYTHIAZOX	N.D.	0.05
125 PYRIMETHANIL	N.D.	0.05	176 BENALAXYL	N.D.	0.05
126 VINCLOZOLIN	N.D.	0.05	177 BENOXACOR	N.D.	0.05
127 FIPRONIL	N.D.	0.05	178 PERMETHRIN	N.D.	0.05
128 FENAMIPHOS	N.D.	0.05	179 PENCONAZOLE	N.D.	0.05
129 FENARIMOL	N.D.	0.05	180 PENCYCURON	N.D.	0.05
130 FENITROTHION	N.D.	0.05	181 BENDIOCARB	N.D.	0.05
131 FENOXANIL	N.D.	0.05	182 PENDIMETHALIN	N.D.	0.05
132 FENOXYCARB	N.D.	0.05	183 BENFLURALIN	N.D.	0.05
133 FENOTHIOCARB	N.D.	0.05	184 PHOSALONE	N.D.	0.05
134 FENOBUCARB	N.D.	0.05	185 FOSTHIAZATE	N.D.	0.05
135 FENCHLORPHOS	N.D.	0.05	186 PHOSPHAMIDON	N.D.	0.05
136 FENSULFOTHION	N.D.	0.05	187 FONOFOS 188 PHORATE	N.D.	0.05
137 FENTHION 138 PHENTHOATE	N.D. N.D.	0.05	189 MALATHION	N.D. N.D.	0.05 0.05
139 FENVALERATE	N.D.	0.05	190 MYCLOBUTANIL	N.D.	0.05
140 FENPROPATHRIN	N.D.	0.05	191 METHACRIFOS	N.D.	0.05
141 BUTACHLOR	N.D.	0.05	192 METHAMIDOPHOS	N.D.	0.05
142 BUTAFENACIL	N.D.	0.05	193 METALAXYL	N.D.	0.05
143 BUTAMIFOS	N.D.	0.05	194 METHIDATHION	N.D.	0.05
144 FTHALIDE	N.D.	0.05	195 METOMINOSTROBIN	N.D.	0.05
145 BUPIRIMATE	N.D.	0.05	196 METOLACHLOR	N.D.	0.05
146 BUPROFEZIN	N.D.	0.05	197 MEVINPHOS	N.D.	0.05
147 FURATHIOCARB	N.D.	0.05	198 MEPRONIL	N.D.	0.05
148 FLAMPROP-METHYL	N.D.	0.05	199 MOLINATE	N.D.	0.05
149 FURILAZOLE	N.D.	0.05	200 LACTOFEN	N.D.	0.05
150 FLUACRYPYRIM	N.D.	0.05	201 BHC	N.D.	0.05
151 FLUQUINCONAZOLE	N.D.	0.05	202 DDT	N.D.	0.05
152 FLUCYTHRINATE	N.D.	0.05	203 ENDRIN	N.D.	0.05
153 FLUSILAZOLE	N.D.	0.05	204 DIELDRIN	N.D.	0.05
N.D.: not detected				-	

Analytical results of pesticides residues in tamarind seed polysaccharide

Analysis date: October 2005

Analysis facility: Food Analysis Technology Center SUNATEC

Sample: Glyloid 3S (cold water soluble product of tamarind seed polysaccharide)

Analysis Method: GC/MS, LC/MS/MS

No	Items	Result (ppm)	Limit of determination (ppm)	No	Items	Result (ppm)	Limit of determination (ppm)
1 EPN		N.D.	0.05	52	CHLORPROPHAM	N.D.	0.05
2 XMC		N.D.	0.05		CHLOROBENZILATE	N.D.	0.05
	NATHRIN	N.D.	0.05		SALITHION	N.D.	0.05
	CONAZOLE	N.D.	0.05		CYANAZINE	N.D.	0.05
	PHOS-METHYL	N.D.	0.05		CYANOPHOS	N.D.	0.05
	TOCHLOR	N.D.	0.05		DIETHOFENCARB	N.D.	0.05
	XYSTROBIN	N.D.	0.05		DICHLOFENTHION	N.D.	0.05
8 ATR/		N.D.	0.05		DICLOBUTRAZOL	N.D.	0.05
9 ANIL		N.D.	0.05		DICLOFOP-METHYL	N.D.	0.05
10 AME		N.D.	0.05		DICHLORAN	N.D.	0.05
11 ALAC		N.D.	0.05		DICHLORVOS	N.D.	0.05
	DOCHLOR	N.D.	0.05		DICOFOL	N.D.	0.05
13 ALLE		N.D.	0.05		DITHIOPYR	N.D.	0.05
14 ISAZ		N.D.	0.05		CYHALOTHRIN	N.D.	0.05
	ENPHOS	N.D.	0.05		CYHALOFOP-BUTYL	N.D.	0.05
	ROCARB	N.D.	0.05		DIPHENAMID	N.D.	0.05
	ROTHIOLANE	N.D.	0.05		DIPHENYLAMINE	N.D.	0.05
	VALICARB	N.D.	0.05		DIFENOCONAZOLE	N.D.	0.05
	DBENFOS	N.D.	0.05		CYFLUTHRIN	N.D.	0.05
	OXACARB	N.D.	0.05		CYFLUFENAMID	N.D.	0.05
		N.D.				N.D.	
	ONAZOLE P		0.05		CYPRODINIL		0.05
	ROCARB	N.D.	0.05		CYPERMETHRIN	N.D.	0.05
	ALFLURALIN	N.D.	0.05		SIMAZINE	N.D.	0.05
24 ETHI		N.D.	0.05		SIMECONAZOLE	N.D.	0.05
	ENPHOS	N.D.	0.05		DIMETHAMETRYN	N.D.	0.05
	XAZOLE	N.D.	0.05		DIMETHIPIN	N.D.	0.05
	OPROPHOS	N.D.	0.05		DIMETHYLVINPHOS	N.D.	0.05
	BENZANID	N.D.	0.05		DIMETHENAMID	N.D.	0.05
29 ETRI		N.D.	0.05		DIMETHOATE	N.D.	0.05
	OSULFAN (α, β)	N.D.	0.05		DIMEPIPERATE	N.D.	0.05
31 OXA		N.D.	0.05		TERBACIL	N.D.	0.05
	FLUORFEN	N.D.	0.05		DIAZINON	N.D.	0.05
	USAFOS	N.D.	0.05		THIAZOPYR	N.D.	0.05
	ENSTROLE	N.D.	0.05		THIOBENCARB	N.D.	0.05
35 CAR	FENTRAZONE-ETHYL	N.D.	0.05		THIFLUZAMIDE	N.D.	0.05
36 CAR	BOFURAN	N.D.	0.05	87	TECNAZENE	N.D.	0.05
	IALPHOS	N.D.	0.05	88	TETRACHLORVINPHOS	N.D.	0.05
	IOXYFEN	N.D.	0.05	89	TETRACONAZOLE	N.D.	0.05
	IOCLAMINE (CAN)	N.D.	0.05		TETRADIFON	N.D.	0.05
	NTOZENE	N.D.	0.05	91	THENYLCHLOR	N.D.	0.05
	SOXIM-METHYL	N.D.	0.05		TEBUCONAZOLE	N.D.	0.05
42 CLO	QUINTOCET-MEXYL	N.D.	0.05	93	TEBUFENPYRAD	N.D.	0.05
43 CLOI	DINAFOP-PROPARGYL	N.D.	0.05	94	TEFLUTHRIN	N.D.	0.05
44 CLOI	MAZONE	N.D.	0.05	95	DELTAMETHRIN	N.D.	0.05
45 CLOI	MEPROP	N.D.	0.05	96	TERBUTRYN	N.D.	0.05
46 CHL	ORTHAL-DIMETHYL	N.D.	0.05	97	TERBUFOS	N.D.	0.05
47 CHL	ORDANE	N.D.	0.05	98	TRIADIMENOL	N.D.	0.05
48 CHL	ORPYRIFOS	N.D.	0.05	99	TRIADIMEFON	N.D.	0.05
49 CHL	ORPYRIFOS-METHYL	N.D.	0.05	100	TRIAZOPHOS	N.D.	0.05
50 CHL	ORFENAPYR	N.D.	0.05	101	TRI-ALLATE	N.D.	0.05
51 CHL	ORFENVINPHOS	N.D.	0.05	102	TRIBUPHOS	N.D.	0.05

	Desult	Limit of		Decult	Limit of
No Items	Result	determination	No Items	Result	determination
	(ppm)	(ppm)		(ppm)	(ppm)
103 TRIFLURALIN	N.D.	0.05	154 FLUTOLANIL	N.D.	0.05
104 TRIFLOXYSTROBIN	N.D.	0.05	155 FLUVALINATE	N.D.	0.05
105 TOLCLOFOS-METHYL	N.D.	0.05	156 FLUFENOXURON	N.D.	0.05
106 NAPROPAMIDE	N.D.	0.05	157 FLUMIOXAZIN	N.D.	0.05
107 NITROTHAL-ISOPROPY	L N.D.	0.05	158 FLUMICLORAC PENTYL	N.D.	0.05
108 PACLOBUTRAZOL	N.D.	0.05	159 PRETILACHLOR	N.D.	0.05
109 PARATHION	N.D.	0.05	160 PROCHLORAZ	N.D.	0.05
110 PARATHION-METHYL	N.D.	0.05	161 PROCYMIDONE	N.D.	0.05
111 HALFENPROX	N.D.	0.05	162 PROTHIOFOS	N.D.	0.05
112 PICOLINAFEN	N.D.	0.05	163 PROPACHLOR	N.D.	0.05
113 BIFENOX	N.D.	0.05	164 PROPAPHOS	N.D.	0.05
114 BIFENTHRIN	N.D.	0.05	165 PROPICONAZOLE	N.D.	0.05
115 PIPEROPHOS	N.D.	0.05	166 PROPYZAMIDE	N.D.	0.05
116 PYRACLOFOS	N.D.	0.05	167 PROPHAM	N.D.	0.05
117 PYRAZOPHOS	N.D.	0.05	168 PROFENOFOS	N.D.	0.05
118 PYRAFLUFEN ETHYL	N.D.	0.05	169 PROPOXUR	N.D.	0.05
119 PYRIDAFENTHION	N.D.	0.05	170 PROMECARB	N.D.	0.05
120 PYRIDABEN	N.D.	0.05	171 PROMETRYN	N.D.	0.05
121 PYRIBUTICARB	N.D.	0.05	172 BROMOBUTIDE	N.D.	0.05
122 PYRIMIDIFEN	N.D.	0.05	173 BROMOPROPYLATE	N.D.	0.05
123 PYRIMINOBAC-METHYL	N.D.	0.05	174 BROMOPHOS	N.D.	0.05
124 PIRIMIPHOS-METHYL	N.D.	0.05	175 HEXYTHIAZOX	N.D.	0.05
125 PYRIMETHANIL	N.D.	0.05	176 BENALAXYL	N.D.	0.05
126 VINCLOZOLIN	N.D.	0.05	177 BENOXACOR	N.D.	0.05
127 FIPRONIL	N.D.	0.05	178 PERMETHRIN	N.D.	0.05
128 FENAMIPHOS	N.D.	0.05	179 PENCONAZOLE	N.D.	0.05
129 FENARIMOL	N.D.	0.05	180 PENCYCURON	N.D.	0.05
130 FENITROTHION	N.D.	0.05	181 BENDIOCARB	N.D.	0.05
131 FENOXANIL	N.D.	0.05	182 PENDIMETHALIN	N.D.	0.05
132 FENOXYCARB	N.D.	0.05	183 BENFLURALIN	N.D.	0.05
133 FENOTHIOCARB	N.D.	0.05	184 PHOSALONE	N.D.	0.05
134 FENOBUCARB	N.D.	0.05	185 FOSTHIAZATE	N.D.	0.05
135 FENCHLORPHOS	N.D.	0.05	186 PHOSPHAMIDON	N.D.	0.05
136 FENSULFOTHION	N.D.	0.05	187 FONOFOS	N.D.	0.05
137 FENTHION	N.D.	0.05	188 PHORATE	N.D.	0.05
138 PHENTHOATE	N.D.	0.05	189 MALATHION	N.D.	0.05
139 FENVALERATE	N.D.	0.05	190 MYCLOBUTANIL	N.D.	0.05
140 FENPROPATHRIN	N.D.	0.05	191 METHACRIFOS	N.D.	0.05
141 BUTACHLOR	N.D.	0.05	192 METHAMIDOPHOS	N.D.	0.05
142 BUTAFENACIL	N.D.	0.05	193 METALAXYL	N.D.	0.05
143 BUTAMIFOS	N.D.	0.05	194 METHIDATHION	N.D.	0.05
144 FTHALIDE	N.D.	0.05	195 METOMINOSTROBIN	N.D.	0.05
145 BUPIRIMATE	N.D.	0.05	196 METOLACHLOR	N.D.	0.05
146 BUPROFEZIN	N.D.	0.05	197 MEVINPHOS	N.D.	0.05
147 FURATHIOCARB	N.D.	0.05	198 MEPRONIL	N.D.	0.05
148 FLAMPROP-METHYL	N.D.	0.05	199 MOLINATE	N.D.	0.05
149 FURILAZOLE	N.D.	0.05	200 LACTOFEN	N.D.	0.05
150 FLUACRYPYRIM	N.D.	0.05	201 BHC	N.D.	0.05
151 FLUQUINCONAZOLE	N.D.	0.05	202 DDT	N.D.	0.05
152 FLUCYTHRINATE	N.D.	0.05	203 ENDRIN	N.D.	0.05
153 FLUSILAZOLE	N.D.	0.05	204 DIELDRIN	N.D.	0.05
N.D.: not dotacted					