State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection

Ben Brancel, Secretary

Submitted by: Otto Oemig
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Subject: Guidance on Nitrogen Stabilizers as Pesticides

References: Instinct Memo (10-7-2010)
               N-Serve Memo (12-7-2010)
               7 U.S.C § 136 [FIFRA]

Common Nitrogen Inhibitors:

Active Ingredient Chemical Name	Abbreviation	Sample Products	Mode of Action	EPA Registered Pesticide
Nitrapyrin	--	Instinct, N-Serve	Nitrification inhibitor	Yes
N-(n-butyl) thiophosphoric triamide	NBPT	Agrotain	Urease (enzyme) inhibitor	No
Dicyandiamide	DCD	Agrotain Plus, Super U	Nitrification inhibitor	Exempt under FIFRA Section 2 (hh) (1)
Ammonium thiosulfate	ATS or Amthio	--	Weak nitrification inhibitor	Exempt under FIFRA Section 2 (hh) (2)
Maleic itaconic co-polymer calcium salt	--	Nutrisphere-N, More than Manure	Weak Urease and Nitrification inhibitor	No
Polymer coated urea	PCU	ESN	Physically slows hydrolysis of urea	No – Use of physical not chemical means

Currently the EPA has only one nitrogen stabilizer active ingredient (A.I.) registered as a pesticide, Nitrapyrin. For more guidance on these products see Instinct memo and N-Serve memo.

Urease inhibitors do not qualify as pesticides because they act on enzymes, rather than organisms. With the exception of dicyandiamide (DCD) and ammonium thiosulfate, nitrification inhibitors may qualify as being a pesticide.

The EPA's rules concerning nitrogen stabilizers as pesticides are covered under FIFRA Section 2 (hh) and 40 CFR 152.6 (b). The state of Wisconsin has no specific rules concerning nitrogen stabilizers as pesticides.

Any living organism that acts as a nitrogen stabilizer is not viewed as a pesticide per 40 CFR 152.6 (b) (1).

This guidance is subject to change if the EPA changes their interpretation of 40 CFR 152.6 (b).