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ESSENTIAL EQUINE**

United States Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Avenue NW
Washington, DC 20460

Sue Kelly, General Manager
Equus Magnificus Inc. (submitters)
526 S. Lamkin Road
Harbor Springs, MI 49740

November 4, 2024

Re: Petition to List the Material Chamaecyparis Lawsoniana Wood Oil CAS # 264201-23-2 On the US EPA FIFRA Minimum Risk Pesticide List 40 CFR 152.25(f).

Dear Administrators,

This petition is in reference to the Environmental Protection 40 CFR Part 152.25(f), Exemption of Certain Pesticide Substances from Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Requirements. The US Environmental Protection Agency identified a list of pesticide active ingredients that it believed were not of a character necessary to be regulated under FIFRA because they pose little to no risk to human health or the environment, 40 CFR 152.25(f)(1).

This petition proposes that the substance Chamaecyparis Lawsoniana Wood Oil (common name Port Orford Cedarwood Oil) with the CAS # 264201-23-2, be added to the list of pesticide active ingredients on the EPA Minimum Risk Pesticide List, 40 CFR 152.25(f)(1).

Chamaecyparis Lawsonia Wood Oil shares the characteristics of the approved Cedarwood Oils on the MRP List, and poses little to no risk to the environment or public health.

Chamaecyparis Lawsonia is the scientific name given to a tree that belongs in the family, Cupressaceae, that honors Charles Lawson, a horticulturist that began cultivating the species in 1854, in Port Orford, Oregon. It is known as the Port Orford Cedar or at times, Lawson cypress. It is a species of conifer that is native to Oregon and northwestern

California. Unsure as to why the substance, when given it's CAS #, was assigned under its scientific name.

The cedarwood oils that are eligible on the MRP list are produced in Texas, China, and Virginia. The cedarwood oil produced in Texas is derived from the *Juniperus Mexicana*, a species of Juniper. Common name is Texas Cedar. The cedarwood oil produced in China is derived from *Cupressus duclouxiana*, common name Chinese cypress and *Cupressus funebris*, common name Chinese weeping cypress. The cedarwood oil produced in Virginia is derived from *Cedrus Atlantica*, from the Pine family, common name Atlas Cedar and *Juniperus Virginiana*, common name Eastern Red Cedar.

The information on the tree species listed above may be found under their respective CAS #'s. The species fall under the Cupressaceae family, except for the Atlas Cedar, which is in the pine family, Pinaceae. The Port Orford Cedar is in the Cupressaceae family.

Chamaecyparis Lawsoniana Wood Oil, under the name Port Orford Cedarwood Oil, given by the CTFA (Cosmetic, Toiletry, and Fragrance Association) is currently sold and used for many purposes.

1. Aromatherapy/diffusers.
2. Perfume.
3. Bath and shower gels.
4. Skin care products.
5. Soapmaking.
6. Candle scent.
7. Shampoos and conditioners.
8. Home use insect repellent.

The oil produced from the Port Orford cedar has a distinct fragrant profile, different from other cedarwood oils. It can be described as being sweetly woody with notes of pine, fennel, anise and coupled with a balsamic, herbal aroma. The oil does not solidify over time.

Port Orford cedar grow in a specific geography, about a 220 mile strip in southwest Oregon and northern California. The industry there does not have the size footprint in the market as the states of Texas and Virginia, nor the country of China, and less known. Family owned sawmills and timber companies are dedicated to the sustainability of harvesting the Port Orford cedar, due to it's exceptional durability, aromatic qualities, and natural resistance to decay. As the lumber is valuable, the oil is distilled from the scrap (not the leaves). With the adding of the Port Orford Cedarwood Oil as an eligible active ingredient on the MRP list, this may have a positive economic impact, increasing demand, for the mills wanting to sell their scrap.

Chamaecyparis Lawsoniana Wood Oil CAS # 264201-23-2 has been assigned the following by the FDA and the EPA.

FDA UNII – 0H3D02DVNU

EPA ITN – 1834773

EPA TSN – E1834773

EPA Comptox – DTXSID001041996

EPA Substance Type – Biological Organism, approved, on Biological Substance List

The submitters of this petition do not produce/distill cedarwood oils. We are a manufacturer of products utilizing essential oils in our formulas. Our purpose is to provide consumers with alternatives when purchasing and respond to the growing demand for more natural methods of pesticide control. The characteristics of the oil produced from Chamaecyparis Lawsoniana (Port Orford cedar) met our expectations as an effective ingredient within our formula. We believe this is due to its distinct aroma. Chamaecyparis Lawsonia Wood Oil poses no risk to the environment or humans. Included with this petition are two attachments. One, a study by the USDA on Acute aquatic toxicity, specifically calling out Port Orford cedar (Chamaecyparis lawsoniana) heartwood oil. Two, WebMD, on the Benefits, Risks, and Uses of Cedarwood Essential Oils, recognizing Port Orford cedarwood by name.

The submitters of this petition recognize the EPA's time and resources needed to administrate pesticides that pose a greater risk to humans and the environment. The submitters of this petition also recognize the time and resources needed to review a petition for the addition of an active ingredient to the MRP list under 40 CFR 152.24 (f)(1). The market share of Chamaecyparis Lawsoniana Wood Oil is smaller than Texas, Virginia and China and may not have been recognized as a cedarwood oil and also due to its assigned chemical name which is its scientific name, which were not assigned to the eligible cedarwood oils.

Thank you for your time and consideration. This is very important to our business as our goal is to provide safe, effective products to consumers. Please contact me with any further questions or requirements.

Regards,



Sue Kelly

General Manager – Equus Magnus Inc.

Office: 877-621-1023; Mobile: 612-916-1822

Email: sue.kelly@equusmagnificus.com