# Product Chemistry and Active Ingredient Characterization

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# What is the active ingredient?

#### Biochemicals

- ▶ Unique chemical structure, protein sequence, or genetic (RNA/DNA) sequence
- Unique conformational aspects of the active ingredient that is apart of the function
  - Protein sequence and genetic sequence folded into an active 3-D shape

#### Microbial Pesticide

- Each isolate is considered a new active ingredient according to US EPA
- ▶ Genetic sequence of the microbial is needed to establish specific unique identity
  - ▶ Genetics of a microbial pesticide do <u>not</u> significantly change over time
  - Nomenclature of a microbial pesticide will change over time as taxonomy changes
- ► How differentiate the microbial pesticide from heterotrophic microorganisms in the environment?
- ▶ How differentiate the microbial pesticide from other isolates of the same taxonomy?

# How is the active ingredient produced?

#### Biochemicals

- Manufacturing methods used to produce active ingredient
  - ▶ Chemical manufacturing methods or biological manufacturing methods
- Chemical contamination present with active ingredient
  - Excess chemicals used in manufacturing, biological by-products, etc...
- ▶ Biological contamination present with active ingredient
  - ▶ Bacteria, fungi, virus, parasite, or other biologic contaminations

#### Microbial Pesticide

- Type of growth method used to grow the active ingredient
  - ▶ Solid fermentation, liquid fermentation, tissue culture, biological host or other method
- ▶ Chemical contamination present with active ingredient
  - ▶ Biological by-products of fermentation, tissue culture by-products, spent growth media, etc...
- ▶ Biological contamination present with the active ingredient
  - ▶ Bacteria, fungi, virus, parasite, or other biologic contaminations

# How stable is the active ingredient?

- Biochemicals and Microbial Pesticides
  - Storage stability of the active ingredient at optimal storage conditions
    - ▶ Stable over days, weeks, months, or year(s)
  - Storage stability of the active ingredient at non-optimal field storage conditions
    - ➤ Stable at elevated temperatures over days, weeks, months, or year(s) to match California climatic field conditions

# **Key Product Chemistry Elements**

#### Product Identity

- ► Composition active ingredient Unique Sequence or Unique shape
  - Nomenclature
- ▶ Differentiation of active ingredient Environment & Similar active ingredients
  - "Enforcement Method"

#### "5-Batch" Analysis

- Manufacture Methods
- ► Contamination Chemical and Biological (Bacterial, Fungal, etc...)

#### ▶ Stability Over Time — Time & Temperature

- Label's Storage Use-Directions
- California Field Storage Conditions

### **Documents Submitted for Review**

- ▶ Public Literature Not considered Confidential Business Information (CBI)
  - Journal Articles
    - ► Complete articles in electronic format (example: PDF) with highlights of relevant information
      - CalPEST
      - No citation only, need submission of complete literature
  - Published Books
    - ➤ Complete chapter(s) in electronic format (example: PDF) with highlights of relevant information
      - ▶ No citation only, need submission of complete literature
- Non-Public Information
  - Complete laboratory reports with raw data in electronic format (example: PDF) with highlights of relevant information
    - Method(s) used need to detailed in report(s)

#### Common Issues that Slows Evaluation Process

- Names used in Documents and Labels
  - Active Ingredient
  - Subject Product
- Documents and Label Text
  - ▶ Too small to read and/or Too blurry to read
  - Unable to differentiate text due to background
- Color documents submitted as Black/White
  - ▶ If color, submit as color
- Spelling errors
- Incomplete or Missing Documents
  - Missing or omitted pages in documents
  - Missing documents
    - ▶ Referenced MRID that were not submitted for review
    - ▶ Referenced EPA documents that were not submitted for review

## **Case Studies**

- Differentiating Active Ingredients
- Taxonomy Changes of Active Ingredients Over Time

# **Differentiating Active Ingredients**

- Register a New Strain of *Beauveria bassiana* in California
- What do you need for "Product Identity" of the new active microbial?

# **Differentiating Active Ingredients**

- Currently Registered Beauveria bassiana
  - ► HF23 (DPR Chemical Code: 5976)
  - ► GHA (DPR Chemical Code: 3993)
  - ► ANT-03 (DPR Chemical Code: 6137)
  - ▶ PPRI 5339 (DPR Chemical Code: 6217)
  - ▶ 203 (DPR Chemical Code: 6575)
  - ▶ BW149 (DPR Chemical Code: 6603)

# Common Ways of Differentiating Active Ingredients

#### Genetic Sequence

- ► RNA (mRNA, 16S rRNA, etc...)
- ► Intracellular plasmids
- Genomic DNA
- Genetic marker sequences

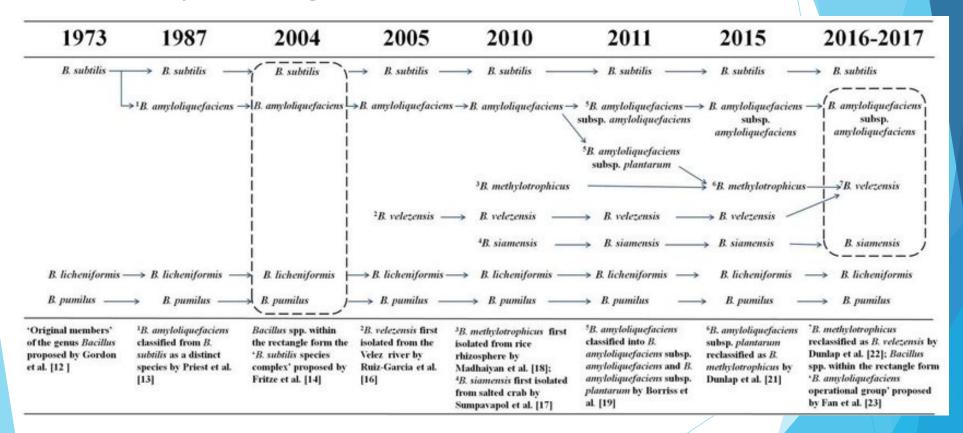
#### Protein Sequence

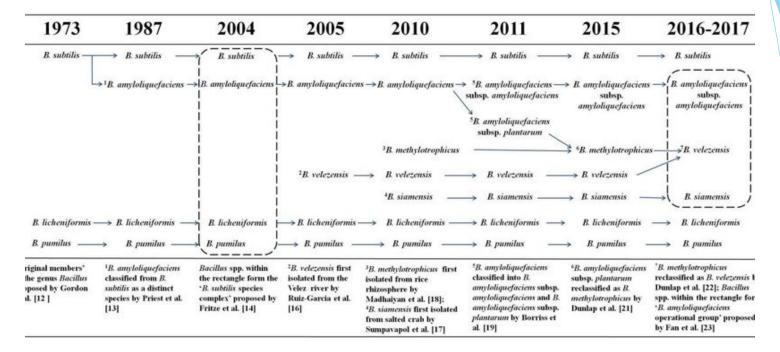
- Intracellular marker protein
- Membrane bound protein
- Secreted protein

# Taxonomy Changes of Microbial Active Ingredients Over Time

- Registered Bacillus in California with outdated nomenclature on labels
- You are updating the nomenclature of Bacillus on the label with California

# Taxonomy Changes of *Bacillus* Over Time





You get a response from California to give supporting evidence for the revision of nomenclature for Bacillus on the label

What evidence do you use to support the nomenclature changes?

## Nomenclature Changes of Active Ingredients

- Best argument at the time of review, using the most current laboratory and literature analysis at the time of review
- Genetics of a microbial active ingredient are considered constant and not changing over time
- Nomenclature is constantly changing over time

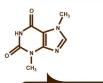
#### **CHOCOLATE CHEMISTRY**

Whether your preference is dark, milk, or white chocolate, here's handy guide to what's inside



DARK CHOCOLATE

COCOA SOLID:>35%



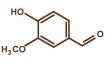
THEOBROMINE

Dark chocolate has the highest amount of Cocoa solids, which remain after cocoa butter is extracted from cocoa beans. The solids contain theobromine, toxic to dogs, and phenethylamine, linked to a feel-good effect.



MILK CHOCOLATE

COCOA SOLID: 35-30%



VANILLIN

Confectioners add vanillin to many milk chocolates to enhance their flavor. American brands of chocolate often contain butyric acid, which adds a sour note to the chocolate's



WHITE CHOCOLATE

COCOA SOLID: 0%



STEARIC ACID

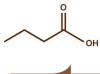
White chocolate does not contain any cocoa solids, only cocoa butter, sugar, and milk. Cocoa butter is composed of a number of fats, mainly stearic acid and palmitic acid.



**Questions?** 



DARK CHOCOLATE



MILK CHOCOLATE



WHITE CHOCOLATE

https://www.chococraft.in