



**Integrated Plant Protection Center**  
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Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington DC 20460-0001  
August 22, 2018

Re: Acephate Registration Review

*The following comment is submitted on behalf of the Western IPM Center, and provides usage information from Pacific Northwest commodities to support EPA's registration review for acephate.*

Acephate (orthene) is used in Pacific Northwest cranberry production to control fireworm and cranberry girdler. Although it is not often used in Oregon, it is a go-to product in Washington for these pests when present, and used once per year as label directs.

In Christmas trees, acephate is an occasional use product. Acephate is used occasionally as an alternative to chlorpyrifos for needle midge control. Some growers alternate bifenthrin and acephate for controlling root weevils. For needle midge control (in Douglas fir production only) and root weevil control (all Christmas tree species) it's generally not used more than one time per year.

In Washington, acephate is used sparingly in alfalfa produced for seed as a post bloom spray for controlling lygus bug.

Acephate is also used in mint for caterpillar control (mostly armyworms), applied late in the season (in WA this is applied through the center pivot).

For the alfalfa and mint uses, there are lower risk alternatives to this product with equal or even greater efficacy, but they are much more costly, which inhibits use.

Because of the risks to terrestrial wildlife and pollinators associated with this product, Oregon State University's IPM Program advises that mitigations to protect wildlife and pollinators are critical to this product's compatibility with IPM programs.

Please feel free to contact me with any further questions about usage of acephate in PNW commodities.

Respectfully,

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*Katie Murray is the Statewide IPM Coordinator for Oregon, and the Northwest IPM Network Coordinator for the Western IPM Center. Katie has expertise in agricultural stakeholder engagement and consultation methods that includes understanding current pesticide usage trends, and pesticide compatibility with IPM.*

*The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.*

*To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect expert testimony from stakeholders, including research and extension experts as well as farmers and commodity groups. The comments do not imply endorsement by Oregon State University or the Western IPM Center.*