



Integrated Plant Protection Center
Katie Murray, Associate Professor of Practice
2040 Cordley Hall, Corvallis, Oregon 97331-2915
Tel: 541-231-1983
katie.murray@oregonstate.edu
ippc.oregonstate.edu

Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001
May, 2020

Re: EPA-HQ-OPP-2011-0865-1161; Proposed Interim Decisions for Several Neonicotinoid Pesticides

The following comments are submitted in response to EPA's proposed interim decisions for several neonicotinoid insecticides. These comments are being submitted on behalf of the Western IPM Center, and provide input from relevant Pacific Northwest commodities on anticipated impacts of the proposed decisions.

Pome Fruits:

Neonicotinoids are moderately used pesticides in pome fruit production. Most pome fruit growers make between 0-3 applications of neonicotinoids per season, in total. The two most common neonicotinoids used in pome fruits are acetamiprid and thiamethoxam, targeting control of pear psylla. At the currently labeled rates, two applications of acetamiprid are considered effective for controlling psylla. In high pressure years, thiamethoxam might also be used. With EPA's proposed rate reduction, growers may be forced to use the full amounts of both materials, as well as adding additional sprays of imidacloprid (currently used rarely due to marginal efficacy). Therefore, the rate reduction would not reduce overall usage of neonicotinoids, rather just vary the use of specific neonicotinoid products.

Hazelnuts:

For soil applications, hazelnut growers use imidacloprid (Admire Pro) at rates from 7 to 14 ounces maximum, with 14 ounces corresponding to .5lb/ai/A. EPA's proposed reduction will set a maximum rate of 10 ounces, or .36/ai/A. Some growers apply this product as a drench in spring, with uptake dependent on precipitation to promote movement of material to roots (irrigation systems lack efficiency for this purpose). The rate reduction for soil-applied imidacloprid could be an issue for soil applications where uptake efficiency is limited by water; a reduced rate could lead to reduced uptake and thus reduced crop protection.

For foliar applications of imidacloprid, the proposed reduction is not expected to have a major effect on pest management.

Hazelnut growers use clothianidin to control pacific flatheaded borer and brown marmorated stink bug (BMSB). The proposed foliar rate reduction for clothianidin



Integrated Plant Protection Center
Katie Murray, Associate Professor of Practice
2040 Cordley Hall, Corvallis, Oregon 97331-2915
Tel: 541-231-1983
katie.murray@oregonstate.edu
ippc.oregonstate.edu

will limit its use in the management of these pests to just one spray. This is of concern because BMSB is now a severe economic pest in hazelnuts, and clothianidin is one of the few non-RUP chemistries and one of the few non-pyrethroids available for managing the pest. It is anticipated that the use of pyrethroid insecticides would increase to compensate for this rate reduction.

Hazelnut growers have two labels for thiamethoxam: one is lambda-cyhalothrin premix (Endigo ZC and Tandem); the other is flagship, which is labeled for non-bearing trees including hazelnuts, and used to control aphids and other plant sucking insects. The proposed crop stage restrictions for thiamethoxam [which read: “do not apply prior to bloom or until petal fall is complete”] are confusing with respect to hazelnuts. Bloom takes place in winter for hazelnuts, and there is no petal fall.

Berries:

Cranberry: Imidacloprid is the main neonicotinoid used in cranberries in Oregon and Washington. The main target pest for this usage is black vine weevil. Growers generally apply up to the currently labeled max rate of 0.5lbs ai/A/yr, applied to soil (via chemigation, or by hand as spot treatment) and watered in. EPA’s proposed reduction to 0.4lbs/ai/A/yr will require growers to reduce rates, and limit rates when more than one application is needed, potentially impacting their ability to effectively manage black vine weevil, a pest which has limited effective alternative treatments. In this case, growers might rely on the application of an additional neonicotinoid (thiamethoxam or clothianidin), or indoxacarb.

Blueberry, Caneberry, and Strawberry: Both imidacloprid and thiamethoxam are used in blueberry, caneberry, and strawberry production for managing aphids (as pests and virus vectors) and other sucking/piercing insects such as leafhoppers, true bugs, etc. When used in any of these crops, control is usually achieved with 1-2 applications per season, depending on pest pressure.

Overall, EPA’s proposed rate reductions are not anticipated have a negative impact on pest management for growers of blueberry, strawberry, and caneberry. In most cases, with the reduced maximum amount allowed per season, growers will be able to still make as many applications as they do currently but at a slightly reduced rate (which should not greatly impact efficacy), or they can use the current maximum rate per application and just reduce the number of applications per season. In addition, there are effective alternatives for these pests.



Integrated Plant Protection Center
Katie Murray, Associate Professor of Practice
2040 Cordley Hall, Corvallis, Oregon 97331-2915
Tel: 541-231-1983
katie.murray@oregonstate.edu
ippc.oregonstate.edu

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

Respectfully,

Katie Murray

Katie Murray
Statewide IPM Coordinator
Integrated Plant Protection Center (IPPC)
Associate Professor of Practice
Department of Environmental and Molecular Toxicology
Oregon State University
541-231-1983
katie.murray@oregonstate.edu

Katie Murray is Statewide IPM Coordinator for Oregon State University, and the Western IPM Center's Northwest IPM Network Coordinator. Katie has expertise in agricultural stakeholder engagement and consultation methods that include 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.