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Office of Pesticide Programs,  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW,  
Washington, DC 20460-0001

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Pesticide Registration Review: Proposed Interim Decisions for Several Pesticides

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The following comments are being submitted in response to the Federal Register notice announcing the availability of and seeking public comments. These comments are being submitted on behalf of the Western Integrated Pest Management Center.

Bifenthrin in Capture, Brigade, Empower, Discipline are insecticides and miticides, used in golf courses, turf grass, nut production, corn, soybean, chinese cabbage, kohlrabi, chinese mustard, asain melons and squash, for use on aphids, leaf miners, asian cockroaches, thrips, whitefly and coffee borer. Bifenthrin is used for corn earworm, corn borers, armyworm, leaf hoppers and thrips in corn and soybean rotation. Bifenthrin is used on golf courses and turf in Hawaii in combination with imidacloprid and zeta-cypermethrin. Turf armyworm appears to have developed tolerance to bifenthrin, the active ingredient in Talstar. Due to its effectiveness Bifenthrin along with *Beauveria bassiana* are the few pesticides that target Coffee Bean Borer. Bifenthrin products are of significant importance for the pacific islands.

Cyfluthrin known as Baythroid, Renounce, Tempo, Aztec are used in corn and soybean rotations in Hawaii to control corn borers, corn earworm, armyworm and thrips. Cyfluthrin is typically applied as a post-emergence in early stages. Lambda-cyhalothrin has a range of uses in crops in Hawaii, such as seed crops and leafy vegetables. The main uses are in Chinese Cabbage, and bok choy to control bagrada bugs. The use in corn/soybean are for corn borers as well as Japanese beetle and aphids

Esfenvalerate, trade name Asana XL, is a registered pyrethroid used in Hawaii for a wide variety of crops with insect damage from leaf hoppers, borers, larvae, weavils, worms and caterpillars.

In Hawaii this product is mainly only used in corn, soybeans and used rotation with a different class of insecticides.

Fluazifop is used in turf grass, ornamentals, coffee and macadamia and grass bioenergy crops, in landscape use, construction and cropping systems in Hawai'i. Fluazifop can be found in Fusion, Fusilade II and Fusilade DX. Fusion plays an important role in turf and ornamental production, along with cut flowers such as protea. Fusion provides grass weed control in landscape settings where grasses are encroaching on the landscape, such as woody shrubs. This is an important product for landscape construction as it is an excellent alternative to RoundUp. Fusion can also be used for Bermuda grass with mixed Garlon (triclopyr) killing weedy species in Bermuda grass for pre-planting. Fusilade is used in crops such as coffee and macadamia nut. Fusilade is widely used as a pre-harvest in newly planted orchards. Because of 13-month pre-harvest intervals, dealing with smaller plants and encroaching weeds without damaging the crop. There is no burn down effect with this perennial grass weed product. Fusilade DX has been used on asparagus, banana, lettuce, macadamia, bulb onion, taro, ginger, turmeric and corm vegetables. This product is important especially for growing culturally important crops such as taro, bird of Paradise, palms and growing seasonal crops like ginger. There are almost no alternatives to the pre-emergence grassy weed control. This product also has increasing use in Maui. The application rate is at 24 fl.oz./acre. Fusilade on protea works well on selective grasses. Fusilade at the recommended rate works excellent for post emergence grasses. There is no yearly use data for turf or ornamental use, and no annual amount listed. This product may have potential drift affect during roadside maintenance or use on grassy fields.

Pyraclostrobin are fungicides, with trade names Cabrio and Pristine, used to treat powdery mildew, downy mildew, leaf spot and several types of rust Pyraclostrobin is most commonly used in small scale, fruit and vegetable production. Other crops include soybean/corn, legume vegetables and grass. Foliar applications are on average between 6-12 fl oz/acre.

Tau-fluvalinate is used as a miticide and insecticide in orchids post-harvest. This is typically used as a dip-treatment, applied before shipment. It is also used as a spray in shade/greenhouse in ornamental production. Tau-fluvalinate and cyfluthrin are used as part of rotation to prevent resistance, since Tau-fluvalinate and cyfluthrin are non-restrictive pyrethroids

Comments compiled and submitted by:



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