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September 10, 2012

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

Subject: **Docket ID Number EPA-HQ-OPP-2012-0373**

Comments in Response to *Registration Review; Pesticide Dockets Opened for Review and Comment and Other Actions*

The following comments are being submitted in response to the July 6, 2012 *Federal Register* notice regarding EPA's establishment of a registration review docket for the insecticide buprofezin. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of buprofezin in Hawai'i.

**Trade Irritant:** Buprofezin is used in Hawai'i because of its efficacy against a narrow range of pests. Among its applications in Hawai'i, buprofezin is used by growers of coffee and tropical fruits. However, there are disparities between US tolerances and some MRLs. Therefore, the potential exists that "trade irritant" issues regarding buprofezin may arise for Hawai'i's producers. There is no MRL in the *Codex Alimentarius* nor is there an MRL for Japan for buprofezin in coffee. Also, there is no MRL in the *Codex Alimentarius* for buprofezin in banana and papaya. (Japan has MRLs for buprofezin in these commodities.) In particular, buprofezin is used in papaya. Shipments of papaya to the EU have temporarily ceased, in part because of a "trade irritant" issue with another pesticide. (At this time, shipments of papaya to the EU are expected to resume. However, the original "trade irritant" issue has not been resolved.)

Comments submitted by:

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