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

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

Comments in Response to *Buprofezin Registration Review: Draft Human Health and Ecological Risk Assessments*

The following comments are being submitted in response to the December 15, 2017 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft human health and ecological risk assessments for the registration review of buprofezin and the February 1, 2018 memorandum subject: "Authorization to extend the public comment period for certain registration review dockets." These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of buprofezin in the production of **coffee and other tropical specialty crops, citrus, olive and pomegranate** in Hawai'i.

For specialty tropical crops and especially those grown in Hawai'i, there is an extremely limited number of products for these crops to control pests listed on the buprofezin labels. Specialty tropical crops include aerola, atemoya, banana, biriba, black sapote, canistel, cherimoya, custard apple, feijoa, guava, jaboticaba, longan, lychee, mamey sapote, mango, papaya, passion fruit, persimmon, pulasan, sapodilla, soursop, star apple, starfruit, sugar apple, and wax jambu. In addition to coffee and the other specialty tropical crops grown in Hawai'i, buprofezin is important for producing citrus, olive and pomegranate crops.

Buprofezin is used in Hawai'i to control scales, leafhoppers, mealybugs and whiteflies. Application rates vary with the pest to be controlled. There are typically two (2) applications made per year.

Green scale is an important pest for coffee production. Uncontrolled, green scale may result in the loss of coffee trees. In some instances where infestations of green scale were high and uncontrolled, all of the trees in that area died. Growers may use buprofezin, imidacloprid, or spirotetramat to control green scale.

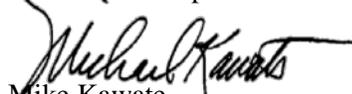
For many of the specialty tropical crops, there are very few pesticides to control the pests controlled by buprofezin. And, while pesticide alternatives for citrus, coffee, olive, pomegranate and some specialty tropical crops are available, use of multiple products may be required to control all pests listed on the buprofezin product label. Available alternatives to buprofezin are: acetamiprid for citrus; spirotetramat for citrus, coffee, pomegranate, and tropical fruit; imidacloprid for banana, citrus, coffee, pomegranate,

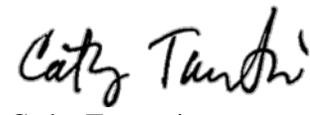
tropical fruit and; and, pesticide products of pyrethrins co-formulated with piperonyl butoxide (PBO). Additionally, an insecticide such as buprofezin is needed for rotation to reduce the likelihood of the development of pesticide resistance by pests.

In addition to its efficacy as a pest control tool for the crops mentioned, above, the 12-hour restricted-entry interval (REI) for buprofezin allows workers to perform the cultural activities and weed management needed to produce their crops.

Comments were received from representatives of the coffee production industries and Extension personnel of the College of Tropical Agriculture and Human Resources of the University of Hawai'i at Mānoa.

Comments complied and submitted by:


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