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IR-4 PROGRAM, WESTERN REGION
DEPARTMENT OF ENVIRONMENTAL TOXICOLOGY
UNIVERSITY OF CALIFORNIA
DAVIS, CALIFORNIA 95616

July 22, 2016

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

RE: EPA-HQ-OPP-2013-0235

The following comments are submitted regarding the proposed establishment of a tolerance for the active ingredient chlorantraniliprole in or on the raw agricultural commodities teff, forage and hay. These comments are being submitted on behalf of the Western Region IR-4 Center, and provide input on the use of chlorantraniliprole and its need for production of the specialty crop teff in Western States.

The IR-4 program is a USDA NIFA granted program whose mission is to facilitate registration of sustainable pest management technology for Specialty Crops and Minor Uses. The IR-4 program is made up of four regional centers, The Environmental Toxicology Department at the University of California, Davis houses the Western Region IR-4 Center.

University of Nevada, Cooperative Extension submitted an IR-4 project request (11854) on behalf of the Nevada teff growers, for the establishment of a tolerance for chlorantraniliprole for the control of armyworms in teff. Teff is a fledgling specialty crop with only approximately 1200 acres of teff grown in Nevada.

Teff is a small grain grown as a warm season cereal crop. Teff is seeded similarly to wheat (grain drill) and cultural practices are similar to other small grains such as wheat, barley, rye and oats. The annual grass crop is popular in the country of Ethiopia, where it is used as a food staple and source of forage for livestock. Teff is adaptable to many environmental conditions including droughts and floods. Over the past couple of years, teff has become a popular source of grain and flour in U.S. health food markets. A major source of nutrition, teff is composed of a good source of amino acids, iron, calcium, phosphorous, copper, aluminum, barium, and thiamine. It is also popular as a wheat substitute, since it contains little gluten.

Armyworms feed on maturing seed heads of teff and reduce grain yields in excess of 60%. Currently teff has no labeled insecticides and during the past two production seasons (2014 and 2015) armyworms have severely impacted crop yields in all parts of Nevada where the crop was produced. An insecticide is urgently needed to control armyworms for successful crop production.

Chlorantraniliprole appears to be a very good fit with IPM program based on its reduced risk status in several other specialty crops including: artichoke, asparagus, lettuce, tomatoes and mint.

The establishment of a tolerance for chlorantraniliprole in teff is necessary for the registration and subsequent labeling of chlorantraniliprole containing products for use in teff for the control of armyworms.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Sisco".

Rebecca (Becky) Sisco
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