College of Tropical Agriculture and Human Resources
Department of Plant and Environmental Protection Sciences

UNIVERSITY of HAWAI'I® MĀNOA

July 24, 2017

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

Subject: **Docket ID Number EPA–HQ–OPP– 2011-0865**
Comments in Response to *Clothianidin Registration Review: Combined Pollinator Risk Assessment* and *EPA's Registration Review Update for Four Neonicotinoid Insecticides*

The following comments are being submitted in response to the May 25, 2017 *Federal Register* notice announcing the availability of and seeking public comment on EPA's combined pollinator risk assessment for the registration reviews of clothianidin and thiamethoxam and the update for the registration reviews of the four neonicotinoid insecticides. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of clothianidin in the production of seed corn and at turf/golf course, ornamental, and landscape sites in Hawai'i.

Seed corn. Clothianidin is used as a seed treatment to control pests that occur early in the crop cycle of in the production of seed corn in Hawai'i. These pests include borers, seed corn maggot, thrips and cutworms. The typical application rate is .25 - 1.25 milligrams of ai per kernel.

Alternatives available to control these pests are very limited in Hawai'i. All other Intetrated Pest Management programs are established by the seed corn producers and clothianidin is one of the tools needed for their IPM program.

Turf and Ornamentals. Products that contain clothianidin as the sole active ingredient and products that contain a combination of clothianidin and bifenthrin are used on golf courses, other turf sites and landscape ornamentals in Hawai'i. Turf and landscape managers use these products to control a variety of insect pests, such as sod webworm, armyworms, cutworms, frit fly, various scale species and mealybug.

These products are popularly-used, selected because they are relatively low-risk systemic insecticides. Contact control is also provided in the products that contain bifenthrin. Alternatives (such as organophosphates) may present more environmental risks and risks to non-target organisms.

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Commenters addressed ways to mitigate risks to pollinators when using clothianidin. Among these are: not applying neonicotinoids when bees are actively visiting flowers; and not allowing weeds to flower after applying a neonicotinoid product to on turf.

Comments were received from a representative of the seed 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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