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MĀNOA

September 25, 2012

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Registration Division (7505P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2012-0334**

Comments in Response to *Clothianidin; Emergency Petition to Suspend; Notice of Availability*

The following comments are being submitted in response to the July 27, 2012 *Federal Register* notice regarding EPA's decision to deny the petitioners' request to suspend the registration of clothianidin and their request for public comment on this decision and the remainder of the petition. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of clothianidin in Hawai'i.

In Hawai'i, aphids and whiteflies are serious pests of several commercial agricultural crops. Clothianidin is an important tool to control whiteflies and aphids on **cucurbits, cabbage and tomatoes** and aphids and pepper weevils on **bell peppers**. These crops are grown for local consumption.

Hawai'i's growers use clothianidin as part of their Integrated Pest Management (IPM) programs. This insecticide is used in rotation with other insecticides to prevent development of resistance. The suspension or cancellation of the clothianidin registration for these crops would result in one less insecticide for growers' rotation schedules. Previously, pest management tactics for these pests included endosulfan, which is now cancelled.

A cucurbit grower who is also a beekeeper reported that he has observed no increased incidence of bee deaths in association with use of clothianidin according to label directions.

Clothianidin is also an important insect management tool for turf and landscape maintenance in Hawai'i.

Information for these comments was obtained from individual growers and a local chemical vendor.

Comments submitted by:

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