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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-2010-0684**

Comments in Response to *Cyfluthrins (& beta) Registration Review: Draft Ecological Risk Assessment*

The following comments are being submitted in response to the November 29, 2016 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of cyfluthrin and beta-cyfluthrin and the May 8, 2017 *Federal Register* notice extending the comment deadline. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on cyfluthrin and beta-cyfluthrin use in the production of seed crops in Hawai'i.

Growers may apply products that contain cyfluthrin or beta-cyfluthrin to corn and soybeans to control planthoppers, corn earworms, armyworms, lesser cornstalk borers and thrips. These pyrethroid insecticides are used during the early vegetative growth stage of the crop.

Growers utilize integrated pest management (IPM). The application rate and frequency is dependent on the level of pest pressure or plant injury level based on scouting reports. An example application rate for beta-cyfluthrin is one application per crop cycle at 0.017 lb/acre to control planthoppers, corn earworm and armyworms. (A crop cycle is four months. Typically, one crop is planted in a field per year. The field is planted in cover crops or fallow for the period between crops.) Some growers may utilize these products only after all other control options have been exhausted.

Hawai'i's conditions allow at least two crop seasons per calendar year. They also create the potential for multiple generations of certain pests in a single year. The availability of these and other pyrethroids facilitates the development of effective insecticide resistance management components of grower's IPM programs. The inability of growers to use cyfluthrins and other pyrethroids may result in high negative impacts on crop yields and large economic losses and may jeopardize long-term crop sustainability of some operations.

Comments were received from representatives of the seed crop producers.

Comments complied and submitted by:


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