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June 10, 2016

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Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2008-0351—Draft Biological Evaluation for Diazinon**

The following comments are being submitted in response to the April 11, 2016 *Federal Register* notice regarding EPA's announcement of the availability of the draft biological evaluations for the registration reviews of all uses of chlorpyrifos, diazinon, and malathion. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of diazinon on **pineapple** in Hawai'i and **various crops** on Guam.

Pineapples grown in Hawai'i are managed using two or three crop cycles from a single planting requiring a minimum of 2.5 years (for two harvests) 3.5 years or more (for three harvests) to complete from planting to last harvest. Pineapple production uses diazinon for mealybug and budmoth control. A reduction in the number of allowed diazinon applications has made it difficult to control both mealybugs and budmoths with diazinon alone. Budmoth control programs require two (2) applications of insecticides during the late flower and early fruit development period. Budmoth feeding during fruit development results in serious insect damage to the fruit and may also result in quarantine intervention if the budmoths are not controlled. If mealybugs are observed in fruit estimation surveys at various points in each of the crop cycles, insecticides for mealybug control are applied, typically once and possibly twice during each crop cycle. Diazinon is rotated with malathion for control of mealybugs in pineapple grown in Hawai'i. Endosulfan (now cancelled) had been used for budmoth control. Diazinon is not as effective as endosulfan for budmoth control.

Because there are few alternatives available, diazinon is used on a variety of crops on Guam.

Input for these comments were received from Hawai'i pineapple industry representatives and Cooperative Extension Service personnel from Guam. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on diazinon use in the production of pineapple in Hawai'i and various crops on Guam.

Comments compiled and submitted by:

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