



**Integrated Plant Protection Center**  
**Katie Murray, Program Leader**  
**IPM Engagement and Implementation**  
2040 Cordley Hall, Corvallis, Oregon 97331-2915  
Tel: 541-231-1983  
katie.murray@oregonstate.edu

Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington DC 20460-0001  
December 4<sup>th</sup>, 2017

Re: EPA-HQ-OPP-2012-0395, Dichlobenil Registration Review

*The following comments are submitted to provide usage information from Pacific Northwest commodities to support EPA's registration review of dichlobenil. These comments are being submitted on behalf of the Western IPM Center.*

Dichlobenil is most used in the Pacific Northwest on perennial fruit crops such as blueberries, caneberries, and cranberries to control perennial weeds. Dichlobenil is also labeled in rhubarb, and very commonly used in landscapes. Depending on the crop, anywhere from 2 to 6 pounds active ingredient might be applied within a season, with lower rates (2lbs) for rhubarb and between 4 and 6lbs for perennial fruits.

The oldest and most commonly used formulation of dichlobenil is Casoron 4G, a granular formulation applied via spreader. Casoron SC is a newer formulation, a liquid applied via spray rig with the spray boom directed toward the ground. This newer product is not used as often as the granular product.

In blueberry and caneberry, this product has limited use due to its expense, difficulty of application relative to other products, and risk for crop injury. Also, the product has to be applied in cold wet weather or it volatilizes, which broadly limits use. When used in blueberry and caneberry, dichlobenil is generally used once per season, in the fall or early winter. For these crops, there are no alternatives for controlling perennial weeds such as blackberries, nutsedge, and bindweed.

In cranberry, this product is important for controlling perennial weeds such as horsetail, for which there are no effective alternatives at present. Mesotrione (Callisto) and napropamide (Devrinol 50 DF) are considered alternatives to dichlobenil for other problem weeds in cranberry.

In cranberry, dichlobenil is usually used once, in the spring. Less than 5% of Pacific Northwest cranberry growers apply a second application in the fall. The average maximum seasonal rate per acre used in cranberry, averaged across Oregon and Washington, would be about 2 lbs active ingredient per acre (for one application), and not exceeding 4 lbs total in a season (for those few who make two applications).



**Integrated Plant Protection Center**  
**Katie Murray, Program Leader**  
**IPM Engagement and Implementation**  
2040 Cordley Hall, Corvallis, Oregon 97331-2915  
Tel: 541-231-1983  
katie.murray@oregonstate.edu

For resistance management, dichlobenil is considered important as a rotational option for weed control. When used as part of IPM programs, mitigations are advised with use of this product based on risks posed to terrestrial wildlife.

Respectfully,

Katie Murray

-----  
Katie Murray  
Program Leader, IPM Engagement and Implementation  
Integrated Plant Protection Center (IPPC)  
Assistant Professor of Practice  
Department of Environmental and Molecular Toxicology  
Oregon State University  
541-231-1983  
[katie.murray@oregonstate.edu](mailto:katie.murray@oregonstate.edu)

*Katie Murray is the Western IPM Center's Information Network Coordinator for the Pacific Northwest. Katie has expertise in agricultural stakeholder engagement and assessment methods related to understanding pesticide usage and pesticide compatibility with IPM.*

*The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.*

*To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect agricultural stakeholder feedback and do not imply endorsement by Oregon State University or the Western IPM Center.*