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Subject: **Docket ID Number EPA-HQ-OPP-2011-0483**
Emamectin benzoate, Case 7607
Comments in Response to *Emamectin benzoate Registration Review: Proposed Interim Decisions for Emamectin benzoate*

The following comments are being submitted in response to the August 8, 2018 Federal Register notice announcing the availability and seeking public comments for EPA's proposed interim registration review decision for Emamectin benzoate. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on available use data of Emamectin benzoate for Crucifer growers in Hawaii.

In Hawaii, Emamectin benzoate (Proclaim) is an important insecticide for use on cabbage and related crops to control the diamondback moth (*Plutella xylostella*) and other lepidopterous pests. Typical application rate is 3.2 -4.8 oz product/Acre per application. Emamectin benzoate is applied on Brassica leafy, head and stem vegetables using a ground sprayer. Three (3) window of applications are made per year depending on presence and severity of pest infestation. The typical application interval is 7 days between applications. Emamectin benzoate (Proclaim) is mainly used in an area-wide resistance management rotation program to control diamondback moth. Crucifer growers use Proclaim in monthly rotation with insecticides from 5 other mode of action groups (Radiant, Diamide, Avaunt, Torac and Rimon) during the year. Proclaim and the diamides (Group 28) are the mainstays of the insecticide rotation program. Diamondback moth is known to be resistant to many insecticides such as pyrethroids, carbamates and organophosphates. Emamectin benzoate (Proclaim) is highly effective for controlling the diamondback moth and is therefore vitally important for diamondback moth management in Hawaii.

Comments were received from a County Extension Agent of the University of Hawaii at Manoa based in Big Island, Hawaii.

Comments compiled and submitted by:

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