Center for Pesticide Registration Research
North Willamette Research & Extension Center
Oregon State University
15210 NE Miley Rd
Aurora, Oregon 97002

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001

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RE: Pesticide Registration Review: Proposed Interim Decisions for Several Pesticides, Ethofumesate
EPA Docket ID: EPA-HQ-OPP-2015-0406-0033

The following comments are submitted regarding the Proposed Interim Decision of the active ingredient ethofumesate. These comments are being submitted on behalf of the Western IPM Center to provide input on the use of ethofumesate in Oregon and Washington. Ethofumesate is an herbicide registered for agricultural uses in grass grown for seed, sugar beets, table beets, carrots, onions, spinach seed, table beet for seed, and Swiss chard for seed.

Our goal is to summarize usage of ethofumesate in select vegetable crops in the Pacific Northwest, and provide stakeholder feedback on how the changes in the Proposed Interim Decision may affect the vegetable and grass for seed industries.

Sugar beet grown for seed
Ethofumesate is a rotational product in sugar beet for seed production. While many of the sugar beet varieties are glyphosate resistant, the pollinator varieties used in seed production are not. Additionally, glyphosate resistant varieties seem to lose resistance to glyphosate during the bolting stage, so rotational options for seed production are necessary. Ethofumesate helps to fill this niche for sugar beet seed producers. Irrigation in sugar beet seed production is primarily center pivot.

Table beet (fresh market and seed), and Swiss chard for seed
Ethofumesate is an extremely important herbicide for table beet for seed and Swiss chard for seed production, with 100% of the conventional acres growing these crops treated with ethofumesate every growing season. Acreage devoted to these crops fluctuates, but roughly

250-500 acres of table beet and Swiss chard for seed are grown annually. The fresh market table beet industry in the Pacific Northwest is currently declining, though ethofumesate is routinely used on the acres that remain. Growers target a broad spectrum of weeds, but the most critical weeds controlled are mustard species.

In general, the seed crop producers are relying on big gun, linear or pivot irrigation systems, and the 7 day restriction on movement of hand line is not a concern in these systems. However, in fresh market table beet systems, the restriction is problematic. In fresh market vegetable systems, smaller acreage plots within a field are planted sequentially so that the produce can be supplied to the market over time. These growers often rely on hand line for irrigating different aged blocks of table beets. Additionally, since these crops are grown from seed, irrigation availability at the time of planting is critical for growing a successful crop.

In beets, the label allows for pre-plant applications and applications to small (2-4 leaf) beet fields. The fresh market industry is interested whether the exemption from the 7 day hand line movement restriction for pre-plant or young plantings, as was granted to carrots, could also be granted for young beets. Alternatively, the industry requests clarification on whether irrigation equipment can be moved within 7 days of application if workers are wearing the early entry PPE specified on the label, and more clear language around this topic on the final label.

Grass grown for seed

The 7 day restriction on movement of hand line is problematic for growers of perennial ryegrass and tall fescue grasses. In parts of the Willamette Valley, eastern Oregon and the Grande Ronde Valley, growers use wheel line for irrigation, which requires workers to be in the field for movement of the line. Other areas of eastern Oregon also use movable line, though the acreage relying on movable line is declining. Ethofumesate requires irrigation to move the material into the soil for effective weed management. When rain is not in the forecast, growers are unable to use ethofumesate without the ability to subsequently irrigate it in. The industry requests clarification on whether irrigation equipment can be moved within 7 days of application if workers are wearing the early entry PPE specified on the label, and more clear language around this topic on the final label.

Grass seed producers have been using the reduced rate of 1.5 lbs a.i./ac since the label for Nortron (ethofumesate) changed in 2020, and the material still provides adequate control. However, a use rate of less than 1.5 lbs a.i./ac would make the efficacy too poor for continued use in the grass for seed cropping system.

The proposed increase of the REI from 12 hours to 48 hours will complicate other field activities requiring completion during the same time of year. These activities include baiting for slugs, baiting for voles, and insect control sprays.

Summary

- The OSU Center for Pesticide Registration Research is responding on behalf of the Western IPM Center to represent Oregon and Washington stakeholders.
- Ethofumesate is critical for table beet, table beet for seed, Swiss chard for seed, and sugar beet for seed production, with up to 100% of the acres treated annually.
- The restriction on movement of hand line 7 days after application will highly impact fresh market vegetable crop production. Growers request an exemption from the requirement when plants are small, as was determined to be acceptable in carrot.
- Vegetable producers and grass seed producers request more clear language on whether early-entry PPE will permit hand-line movement prior to expiration of the 7 day restriction.
- Increasing the REI to 48 hours may complicate other field activities required in grass for seed production.

Please feel free to contact us with additional questions about ethofumesate usage in Pacific Northwest agricultural production.

Respectfully,

Dani Lightle, Ph.D.
Assistant Professor of Practice
Center for Pesticide Registration Research
North Willamette Research and Extension Center
Oregon State University
15210 NE Miley Rd, Aurora, OR 97002
Email: danielle.lightle@oregonstate.edu

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 expert testimony from stakeholders, including research and extension experts as well as farmers and commodity groups. The comments do not imply endorsement by Oregon State University or the Western IPM Center.