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USDA Office of Pest Management Policy 1400 Independence Ave. S.W. Washington DC, 20250

Re: Ethoprop

Dr. Epstein,

The following comments are offered in response to your information request on ethoprop usage. These comments are being submitted to provide input from Pacific Northwest commodities.

Ethoprop is considered an important tool in mint production, particularly peppermint. Verticillim wilt is a major disease that impacts field longevity, and this disease can be moved around fields by nematodes, which weaken plants and make them more susceptible. Ethoprop is generally applied one time during the average 5-7 year life of the stand to manage this problem. 4 quarts would be the normal application amount.

For hops, ethoprop is commonly used on newly planted or "baby" hops to control symphylans. More than half of the acreage ($\sim60\%$) is also treated post-harvest at 2 quarts per acre, for controlling symphylans and also prionus beetle.

In peppermint, there are not alternatives for nematode suppression in an established field.

In hops, thiamethoxam is registered for symphylans, but control is inconsistent. For prionus beetle control, a mating disruption program has been developed by Jim Barbour at the University of Idaho, but the pheromone still awaits EPA approval.

Respectfully,

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