

January 4, 2021

Office of Pesticide Programs,
Environmental Protection Agency
1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Docket Number: EPA-HQ-OPP-2015-0649-0021
Draft Human Health and/or Ecological Risk Assessments for Several Pesticides
Metaldehyde, Case 0576 (EPA-HQ-OPP-2015-0649) Rachel Eberius, eberius.rachel@epa.gov,
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The following comments are being submitted in response to the Federal Register notice announcing the availability of and seeking public comments. These comments are being submitted on behalf of the Western Integrated Pest Management Center.

Metaldehyde has been a very important product for farmers here. The alternatives (iron phosphate, sulfur, sodium ferric EDTA) simply do not work on our giant African snail and veronicellidae slug populations. Since the metaldehyde label changed to prohibit applications to sites from which it is not possible to exclude children or pets, our local vendors stopped stocking metaldehyde products. So farmers have been ordering it themselves.

Favored products have been granular formulations applied by hand or spreader. We use this product on 23 acres of landscape plants. Application by shaker cans works very well. Slugs and snails at Magoon have been proven to carry rat lungworm disease. Magoon is part of the U.S. and Hawaii state infrastructure due to our training and research mandate in agricultural sciences. We use metaldehyde in bait traps made from PVC pipe to keep slugs and snails from destroying demonstration crops used in teaching labs and in growth structures where agricultural research is conducted with a variety of food and ornamental crops. Metaldehyde is a crucial pest control agent here and without it we could not conduct our teaching and research mission.

Comments compiled and submitted by:



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