

Fwd: EPA Questions for USDA on the use and benefits of oxamyl on select crops

Katie Murray <Katie.Murray@oregonstate.edu>

Fri 5/4/2018 2:34 PM

To: Matt Enrico Baur <mebaur@ucanr.edu>;

1 attachments (117 KB)

Pacific Northwest Oxamyl usage information April 2018.pdf;

Hi Matt,

Forgot to cc you here but maybe you want to add this to the comments d-d-d-d-.....database (so hard to say that word).

Warmly,
Katie

Begin forwarded message:

From: Katie Murray <Katie.Murray@oregonstate.edu>
Subject: Re: EPA Questions for USDA on the use and benefits of oxamyl on select crops
Date: April 30, 2018 at 1:50:44 PM PDT
To: "Epstein, David" <david.epstein@ars.usda.gov>
Cc: Amanda Crump <acrump@ucanr.edu>

Hi Dave,

Attached please find info from the PNW in response to the oxamyl information request sent through the Centers.

Warmly,
Katie

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From: "Epstein, David" <David.Epstein@ARS.USDA.GOV>

Date: Thursday, April 19, 2018 at 6:09 AM

To: Amanda Crump <acrump@ucanr.edu>, Danesha Seth Carley <Danesha_Carley@ncsu.edu>, "Lynnae Jess (jess@cns.msu.edu)" <jess@cns.msu.edu>, "Ratcliffe, Susan T" <sratclif@illinois.edu>

Cc: "Hill2, Elizabeth - ARS" <Elizabeth.Hill2@ARS.USDA.GOV>

Subject: FW: EPA Questions for USDA on the use and benefits of oxamyl on select crops

Hello all,

EPA reached out with the questions, below, regarding oxamyl use on non-bearing fruit; bananas, plantains, and pineapple; sweet potato, mint and ginger root . Any information you can provide is appreciated. The original request came from EPA on April 6, but got lost in the shuffle. If you can get back to me within 2 weeks, that would be great. Thanks.

Dave

Questions

EPA is seeking information from USDA regarding oxamyl use on non-bearing fruit (e.g., apple, cherry, citrus, peach, pear).

1. Is oxamyl used on non-bearing fruit (specify crop)?
 - a. As an insecticide? Or as a nematicide? Or both as an insecticide and a nematicide? Please explain.
2. If oxamyl is used on non-bearing fruit (specify crop),
 - a. What application rates are used?
 - b. How many applications are made per year?
 - c. How is it applied?
3. For non-bearing fruit (specify crop), what are the primary target pests of oxamyl?
 - a. Are dual use/target pest applications common (i.e. those that target insects and nematodes purposefully or incidentally)?
 - b. What are the alternatives to oxamyl for control of these pests?
 - c. What are the advantages and disadvantages of oxamyl relative to its alternatives (efficacy, cost, etc.)? Please explain.
4. Are there regional differences in the use and importance of oxamyl? Please explain.

EPA is seeking information from USDA regarding oxamyl use on bananas, plantains, and pineapple.

1. Is oxamyl used on bananas, plantains, and pineapple (specify crop)?
 - a. As an insecticide? or as a nematicide? Or both as an insecticide and a nematicide? Please explain.
2. If oxamyl is used,
 - a. What application rates are used?
 - b. How many applications are made per year?

- c. How is it applied?
3. For bananas, plantains, and pineapple (specify crop), what are the primary target pests of oxamyl?
 - a. Are dual use/target pest applications common (i.e. those that target insects and nematodes purposefully or incidentally)?
 - b. What are the alternatives to oxamyl for control of these pests?
 - c. What are the advantages and disadvantages of oxamyl relative to its alternatives (efficacy, cost, etc.)? Please explain.
4. Are there regional differences in the use and importance of oxamyl? Please explain.

EPA is seeking information from USDA information regarding oxamyl use on sweet potato.

1. Is oxamyl used on sweet potato?
 - a. As an insecticide? or as a nematicide? Or both as an insecticide and a nematicide? Please explain.
2. If oxamyl is used,
 - a. What application rates are used?
 - b. How many applications are made per year?
 - c. How is it applied?
3. For sweet potato, what are the primary target pests of oxamyl?
 - a. Are dual use/target pest applications common (i.e. those that target insects and nematodes purposefully or incidentally)?
 - b. What are the alternatives to oxamyl for control of these pests?
 - c. What are the advantages and disadvantages of oxamyl relative to its alternatives (efficacy, cost, etc.)? Please explain.
4. Are there regional differences in the use and importance of oxamyl? Please explain.

EPA is seeking information from USDA information regarding oxamyl use on mint.

1. Is oxamyl used on mint?
 - a. As an insecticide? or as a nematicide? Or both as an insecticide and a nematicide? Please explain.
2. If oxamyl is used,
 - a. What application rates are used?
 - b. How many applications are made per year?
 - c. How is it applied?
3. For mint, what are the primary target pests of oxamyl?
 - a. Are dual use/target pest applications common (i.e. those that target insects and nematodes purposefully or incidentally)?
 - b. What are the alternatives to oxamyl for control of these pests?
 - c. What are the advantages and disadvantages of oxamyl relative to its

alternatives (efficacy, cost, etc.)? Please explain.

4. Are there regional differences in the use and importance of oxamyl? Please explain.

EPA is seeking information from USDA regarding oxamyl use on ginger root.

1. Is oxamyl used on ginger root?
 - a. As an insecticide? or as a nematicide? Or both as an insecticide and a nematicide? Please explain.
2. If oxamyl is used,
 - a. What application rates are used?
 - b. How many applications are made per year?
 - c. How is it applied?
3. For ginger root, what are the primary target pests of oxamyl?
 - a. Are dual use/target pest applications common (i.e. those that target insects and nematodes purposefully or incidentally)?
 - b. What are the alternatives to oxamyl for control of these pests?
 - c. What are the advantages and disadvantages of oxamyl relative to its alternatives (efficacy, cost, etc.)? Please explain.
4. Are there regional differences in the use and importance of oxamyl? Please explain.

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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001
April 30, 2018

Re: Oxamyl information request

The following comments are submitted in response to OPMPs request for usage information regarding oxamyl. These comments are being submitted on behalf of the Western IPM Center, and provide input from Pacific Northwest commodities.

In mint, oxamyl (Vydate) has been used throughout the Pacific Northwest for nematode control, particularly for root-lesion nematode (*Pratylenchus penetrans*). Although it is an insecticide as well, oxamyl is primarily used as a nematicide in mint, and more commonly used in peppermint than other mint crops. As a nematicide, one, sometimes two applications of oxamyl are generally made in the spring as mint breaks winter dormancy, applied through center pivot in Washington, or and/or ground with irrigation in other states.

However, there has been no supply of oxamyl available to mint producers since 2014 due to manufacturing issues by the supplier. It has just regained availability last month, and mint growers are returning to use it.

Alternatives to oxamyl are soil fumigation with 1,3 dichloropropene (Telone), and fall application of ethoprop (Mocap). Telone can only be applied before planting, and is also expensive, which limits its use. Ethoprop is also more expensive than oxamyl, and can only be applied either before planting or after harvest (225 day PHI). It also requires soil incorporation followed by irrigation so is more labor-intensive to apply than oxamyl. Thus, oxamyl is the only option available to mint producers for spring treatments.

Although oxamyl is registered in apple, pear, cherry, and stone fruit, it is not widely used in these crops in the Pacific Northwest. The pear industry notes in their 2014 [Pest Management Strategic Plan](#) oxamyl's toxicity to predatory mites, which makes it less compatible with IPM programs. Its use in onions is limited due to only fair efficacy, and toxicity issues. Oxamyl is classified as a highly hazardous pesticide by FAO/WHO and is therefore slated internationally for removal and replacement. Thus, for IPM programs, it will be important to research and identify less toxic alternatives.

Please feel free to contact me with any further questions about usage of oxamyl in PNW commodities.



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Respectfully,

Katie Murray

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Katie Murray is the Western IPM Center's Northwest IPM Network Coordinator. Katie has expertise in agricultural stakeholder engagement and consultation methods that include understanding current pesticide usage trends, 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 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.