



Integrated Plant Protection Center
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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001
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Re: EPA-HQ-OPP-2010-0028, Oxamyl proposed interim decision

The following comments are submitted in response to EPA's proposed interim decision regarding oxamyl (EPA-HQ-OPP-2010-0028). These comments are being submitted on behalf of the Western IPM Center, and provide input from Northwest commodities.

In the Northwest, oxamyl is used primarily in mint, potatoes, and onions for nematode control. This use offers control for other pests as well, including potato insects and mint diseases like *Verticillium* wilt.

As a nematicide in mint, one to two applications of oxamyl are generally made in the spring as mint breaks winter dormancy, applied through center pivot in Washington, and/or ground application with irrigation in other states. If two applications are made, they are applied approximately two weeks apart at a rate of 1.0 lb/a.i. per acre, per application.

In mint, common heights above the crop canopy for chemigation applications are typically 5-8 feet. The proposed limit on boom height to 4 feet above the crop canopy would require producers to alter their equipment for application of this product. The potential for off-crop losses will however be reduced.

Alternatives for oxamyl use in mint 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 it is more labor-intensive to apply than oxamyl. Oxamyl is the only option available to mint producers for spring treatment.

In potatoes, oxamyl is used for nematode control. In areas with longer growing seasons, it can be used up to eight times within a season for nematode control, to limit continued hatching of nematode juveniles. Alternatives include 1,3 dichloropropene (Telone), but that product has been in short supply in recent years. Oxamyl is the only product available for use throughout the growing season.



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In onions, the use of oxamyl is limited because of its efficacy is only fair, and users have concerns about its toxicity. If used, it is usually limited to one application, early in the season for nematode and bulb mite management.

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. This side-effect makes it less compatible with IPM programs because foliar mite infestations can be very damaging, and effective mite management relies upon biological control.

Oxamyl is classified as a highly hazardous pesticide by FAO/WHO, and it is therefore slated internationally for removal and replacement. For IPM programs, it is critical to research and identify less toxic alternatives for industries currently relying on this product as a go-to treatment for nematodes and other pests. Until efficacious alternatives are identified, this product will remain critical for several industries.

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

Respectfully,

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Katie Murray is Statewide IPM Coordinator for Oregon State University, and 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



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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.