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July 7, 2017

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

Subject: **Docket ID Number EPA-HQ-OPP-2011-0039**
Comments in Response to *Permethrin Registration Review: Draft Ecological Risk Assessment*

The following comments are being submitted in response to the November 29, 2016 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of permethrin and the May 8, 2017 *Federal Register* notice extending the comment deadline. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on permethrin use in the production of seed crops in Hawai'i.

Growers may apply products that contain permethrin to corn and soybeans to control armyworms, corn earworms, plant hoppers, lesser cornstalk borers, cutworms, leafhoppers and thrips. These pyrethroid insecticides are used during the vegetative stages of the crop.

Growers utilize integrated pest management (IPM). The application rate and frequency is dependent on the level of pest pressure or plant injury level based on scouting reports. An example application rate for permethrin of 0.15 lb/acre, one application per crop cycle, is used to control armyworms, corn earworms and planthoppers. (A crop cycle is four months. Typically, one crop is planted in a field per year. The field is planted in cover crops or fallow for the period between crops.) Fewer applications are made if pest pressures are below threshold levels. Another example is an application rate of 0.01 lb/acre, applied three times per crop cycle at 5-day intervals to control corn earworm, cutworms, leafhoppers and lesser cornstalk borer. Some growers may utilize these products only after all other control options have been exhausted.

When uncontrolled, and pest pressures are high, some operations have experienced complete crop failure. The inability of growers to use permethrin and other pyrethroids may result in high negative impacts on crop yields and large economic losses and may jeopardize long-term crop sustainability of some operations.

Rotation of pesticides with different modes of action is a foundation for resistance management. The availability of permethrin and other pyrethroids facilitates the development of effective insecticide resistance management components of grower's IPM programs.

Comments were received from representatives of the seed crop producers.

Comments complied and submitted by:



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