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Wilfred Burr, Ph.D.
Entomologist
Office of Pest Management Policy (OPMP)
Agricultural Research Service (ARS)
United States Department of Agriculture (USDA)
1400 Independence Ave SW
Room 3859, South Ag Building
Washington, DC 20250-0315

The following information is provided to you from the Western Integrated Pest Management Center in response to your March 9, 2006 inquiry regarding permethrin. You asked for input on the proposed rate reductions and retreatment intervals for this insecticide. When making inquiries in the six-state Pacific Northwest (PNW) region, comprised of Alaska, Idaho, Oregon, Montana, Utah, and Washington, I received responses for alfalfa, vegetable crops, vegetable seed crops, corn, filbert, and potato. All replies, except those pertaining to sweet corn and vegetable seed, indicated that growers had no concerns with the use rate reductions or retreatment intervals being proposed by the various permethrin registrants. The issues raised for sweet corn and vegetable seed production are summarized below.

Sweet Corn

For some of the sweet corn production in the PNW, permethrin has been replaced with newer synthetic pyrethroids and the proposed changes in use rates and retreatment intervals are not considered a problem. However, in Washington, where permethrin continues to be used for the control of corn earworm, growers expressed concerns about the proposed retreatment interval. Current practice is to apply permethrin every five days when corn earworm pressure is high. This retreatment interval is necessary because of the very short life cycle of the pest. Growers are concerned that extending the retreatment interval to 10 to 15 days as proposed will require them to apply permethrin and then five days later make an application of an older insecticide such as methomyl (Lannate). This would be followed with another permethrin application five days later. Growers are concerned that switching chemicals will increase the probability for an application error. Also growers are reluctant to move back to using older chemistries that they feel are less safe than permethrin.

We are asking that the retreatment interval for sweet corn not exceed five days.

Vegetable Seed Crops

Permethrin is used in the production of vegetable seed in both Oregon and Washington. The primary crops of concern are cabbage seed, Chinese cabbage seed, Brussels sprouts seed, and spinach seed. For these crops, growers are concerned about both the proposed retreatment intervals and the rate reductions.

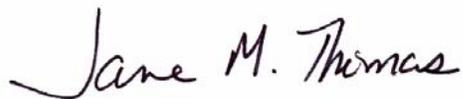
In Washington cabbage seed and spinach seed production, permethrin is used to control loopers and, to some extent, aphids. Here permethrin is typically applied at 0.2 # ai/A twice a season. In years of higher pest pressure, growers may require three applications per season. In this case the proposed application rate is not a concern. However, because the residual is short, growers feel that a 10 to 15 day retreatment interval is too long and would prefer that labels allow a three to five day retreatment interval.

In Oregon vegetable seed production, permethrin is used on cabbage seed, Chinese cabbage seed, and Brussels sprouts seed. I was unable to obtain more detailed use information; however, the Extension Horticulturist with Oregon State University stated that both the proposed rate reduction and the retreatment intervals would be problematic for growers.

Because the vegetable seed crops are non-food, non-feed commodities, we are asking that current use rates be retained, that up to three applications per season be allowed, and that a three to five day retreatment interval be established for vegetable seed crop uses on future labeling.

I am including a contact list should you have further questions. I hope that you find this information useful.

Sincerely,



Jane M. Thomas
Pacific Northwest Workgroup Comment Coordinator
Washington State Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99354
phone: 509-372-7493 fax: 509-372-7491
e-mail: jmthomas@tricity.wsu.edu

Contact List
Permethrin: Proposed Use Rates

Crop:	Last Name:	First Name:	Organization:	Title:	Work Ph:	Email:	Responsible State:
alfalfa	Kugler	John	Washington State University	Area Extension Educator	(509) 754-2011 ext. 413	kugler@wsu.edu	Washington
alfalfa	Deer	Howard	Utah State University	Pesticide Coordinator	(435) 797-1602	howardd@ext.usu.edu	Utah
corn, field	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
corn, sweet	Gill	Jim	Norpac Foods	Agriculture Research and Development Manager	(503) 769-2101 ext. 136	gill@norpac.com	Oregon
corn, sweet	Knudson	Chris	Twin City Foods	Fieldman	(509) 962-9806	chrisk@twincityfoods.com	Washington
corn, sweet	Johnson	Dale	Twin City Foods	Field Department Manager	(509) 727-4692	dalej@twincityfoods.com	Washington
corn, sweet	McReynolds	Bob	Oregon State University	Extension Horticulturist	(503) 678-1264 ext. 25	bob.mcreynolds@oregonstate.edu	Oregon
corn, sweet	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
cucrbits	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
filbert	Owen	Polly	Hazelnut Marketing Board	Manager	(503) 678-6823	hazelnut@oregonhazelnuts.org	Oregon
onion, dry bulb	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
potato	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
potato	Jensen	Andy	Washington Potato Commission	Director of Research	(509) 765-8845	ajensen@potatoes.com	Washington
potato seed	Hirnyck	Ronda	University of Idaho	Pesticide Coordinator	(208) 364-4046	rhirnyck@uidaho.edu	Idaho
vegetable	Drost	Dan	Utah State University	Vegetable Specialist	(435) 797-2258	dand@ext.usu.edu	Utah
vegetable seed	Lyons	Milo	Alf Christiansen	Production Manager	(360) 419-3021	milo_lyons@alfseed.com	Washington
vegetable seed	McReynolds	Bob	Oregon State University	Extension Horticulturist	(503) 678-1264 ext. 25	bob.mcreynolds@oregonstate.edu	Oregon
vegetable seed	Picha	Gary	Syngenta Seeds		(360) 757-4184	gary.picha@syngenta.com	Washington
N/A	Bierman	Peter	University of Alaska Fairbanks	Western IPM Center State Liaisons/Representatives	(907) 745-3639	ffpmb@uaf.edu	Alaska
	Blodgett	Sue	Montana State University		(406) 994-2402	blodgett@montana.edu	Montana
	Daniels	Catherine	Washington State University		(509) 372-7495	cdaniels@tricity.wsu.edu	Washington
	Deer	Howard	Utah State University		(435) 797-1602	howardd@ext.usu.edu	Utah
	Hirnyck	Ronda	University of Idaho		(208) 364-4046	rhirnyck@uidaho.edu	Idaho
	Jahns	Tom	University of Alaska Fairbanks		(907) 262-5824	fftrj@uaf.edu	Alaska
	Jenkins	Jeff	Oregon State University		(541) 737-5993	jenkinsj@ace.orst.edu	Oregon