



**Integrated Plant Protection Center**  
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Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington DC 20460-0001  
May 15, 2019

**Re: Proposed Interim Registration Review Decisions for pymetrozine; EPA-HQ-OPP-2013-0368**

*The following comments are submitted in response to EPA's proposed interim registration review decision regarding pymetrozine. These comments are being submitted on behalf of the Western IPM Center, and provide input from Northwest commodities and university experts.*

Pymetrozine has been used regularly in Northwest potatoes to control insect pests including aphids and psyllids. It is generally applied up to two times, after foliage and insect presence have appeared on the emerged plants. It is considered very effective, and easy to use due to the ability to apply by ground, air, or chemigation.

The proposed changes to pymetrozine would negatively impact almost all potato acres in eastern Washington, and likely also eastern Oregon, as most of this land would be considered sandy soil with less than 3% organic matter. Without the ability to apply by air or chemigation, which is needed after cultivation to avoid crop injury with ground applications, pymetrozine would be lost as a viable option. There is not a need for use before cultivation (which makes ground application easier) due to the lack of foliage and pest pressure.

The risks associated with this product do make it a good candidate for replacement with alternative, lower risk products to keep potato programs compatible with IPM.

Please feel free to contact me with any further questions about usage of pymetrozine in Northwest potatoes.

Respectfully,

Katie Murray

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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 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.*