
Comments in Response to Pyrethrins Risk Assessments; Notice of Availability, Federal Register Notice

Date: June 27, 2005

To: EPA

Subject: [Docket ID number OPP-2005-0043](#)

Comments in response to: *Pyrethrins Risk Assessments; Notice of Availability, Federal Register Notice* March 30, 2005 (Vol. 70, No. 80) [OPP-2005-0043; FRL-7704-7]

Mosquito Control

In the state of Hawaii, probably, the single largest use of pyrethrins is for mosquito control in sugarcane. With the threat of mosquito vectored diseases looming, especially West Nile Virus, the sugar operations have been required by the Hawaii State Department of Health to pursue an aggressive control program of mosquito larvae and adults. The adulticide is applied regularly by a ground rig as an ULV fog. A representative sugarcane grower has chosen to use the only product available that has sugarcane on the label, although, technically, the sugarcane is NOT the treated site.

Ornamentals

Pyrethrins are used by some flower growers who produce: orchid, pikake, poinsettia, rose, ginger, and others. The pyrethrins are effective in controlling a variety of insect and mite pests such as ants, a number of caterpillars, fungus gnats, midges, aphids, mealybugs, orchid weevils, scales, spittle bugs, thrips and leafhoppers.

Although pyrethrins may not be the best alternative for all of these, they are an essential part of the rotations for controlling these pests. One of their advantages is their broad spectrum effectiveness. Rarely is one pest the single main pest of flower crops. It is more often a complex of two, three or even more insect and mite pests. Pyrethrins can be used for controlling these complexes.

Pyrethrins are sometimes used with other insecticides to flush out cryptic insects like thrips. They force the thrips out of their hiding places and allow the more effective insecticides to contact and kill them. Without the pyrethrins the more effective contact insecticides would not work.

Some flower growers use pyrethrins exclusively for the above applications.

Food processing/storage

Although not a major application, pyrethrins are used in food processing/storage.

Small farms and nurseries

Pyrethrins are applied on a few small farms and nurseries. Likely applications are on herbs, "exotic" fruits and/or vegetables.

Pyrethrins have been important for some vegetable growers to "fill" an insecticide application for larval control. Diamondback moth on cabbage and pickle worm (first reported in November, 2003) on cucurbits are two examples of such applications. Pyrethrins meet the need for efficacious, alternative materials so that farmers do not overuse the primary insecticide. However, relatively few growers use pyrethrin products exclusively as the "fill" insecticide-many use BT or pyrethroid

products. Pyrethrins (or pyrethroids) are not the primary insecticide for larval control on vegetable crops.

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