College of Tropical Agriculture and Human Resources
Department of Plant and Environmental Protection Sciences

UNIVERSITY of HAWAI'I® MĀNOA

November 21, 2017

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Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460–0001

Subject: **Docket ID Number EPA–HQ–OPP–2011–0666**
Comments in Response to Registration Review Proposed Interim Decision: Spinetoram.

The following comments are being submitted in response to the September 22, 2017 *Federal Register* notice by EPA regarding *Registration Review Proposed Interim Decision*s: *Several Pesticides*. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of spinetoram in coffee, corn and orchid production in Hawai'i.

Coffee.
In Hawai'i, spinetoram is used to control lepidoptera. Tests have shown efficacy of spinetoram against coffee berry borer, an important economic pest of coffee. The application rate is 0.0781 lbs ai/acre in 50 gallons of water. Because of the potential to develop resistance, one application per year is applied. Alternatives to spinetoram are: IPM, *Beauveria bassiana*, and a combination of piperonyl butoxide and pyrethrins.

Corn.
Corn producers use spinetoram to control corn earworm. There are different scenarios for the use of spinetoram in corn. In one scenario, typically, one application of 0.0469 lb ai/acre is applied per a four-month crop cycle. In another, the application rate is typically 0.0313 lb ai/acre and, on average, 3-4 applications are made per crop on a single location per year Rates may vary and additional applications are made, dependent on pest pressure. Corn producers who select spinetoram do so because it fits in their integrated pest management (IPM) programs.

Potted orchids.
Thrips can be serious pests of orchid production in Hawai'i. Although no longer licensed for sale in the state, orchid growers reported success in controlling thrips using the combination product

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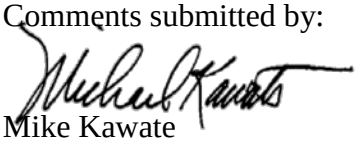
of spinetoram and sulfoxaflor. Orchid growers would likely use this product if it were to become available again.

Comments indicated no anticipated problems with the proposed mitigation measures to reduce spray drift.

Comments were provided by representatives of the corn and orchid production industries and extension personnel at the College of Tropical Agriculture and Human Resources.

Comments submitted by:



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