



UNIVERSITY
of HAWAII®
MĀNOA

October 26, 2015

Andrea Mojica
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: **Sulfoxaflor**

The following comments are being submitted in regard to the decision by the 9th Circuit Court of Appeals to vacate EPA's registration of sulfoxaflor. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of sulfoxaflor in Hawai'i.

Because sulfoxaflor is new to the Hawai'i marketplace, there is little information about its use.

However, there is some interest in the potential of sulfoxaflor products in Hawai'i due to the extensive number of crops labeled.

Closer SC and Sequoia (both 62719-623) are registered on watercress and licensed in Hawaii. The target pests are aphids and leafhoppers which are occasional, but serious insect pests of watercress. There are very few new registrations that the watercress growers can use for insect control. However, we don't know how much sulfoxaflor, if any, is being used in watercress.

Also, Xxpire (62719-767), a product which is the combination of sulfoxaflor and spinetoram, has been mentioned for use for the production of poinsettias and in non-residential landscapes. Details about these uses, such as target pest(s) and efficacy of Xxpire are not known.

Comments submitted by:

Handwritten signature of Mike Kawate in black ink.

Mike Kawate
Pesticide Registration Specialist
Voice: 808-956-6008
mike@hpirs.stjohn.hawaii.edu

Handwritten signature of Cathy Tarutani in black ink.

Cathy Tarutani
Educational Specialist
Voice: 808-956-2004
cathy@hpirs.stjohn.hawaii.edu