



**Integrated Plant Protection Center**  
**Katie Murray, Faculty Research Assistant**  
2040 Cordley Hall, Corvallis, Oregon 97331-2915  
Tel: 541-231-1983 | Fax: 541-737-3080  
[murramar@science.oregonstate.edu](mailto:murramar@science.oregonstate.edu)  
<http://ipmnet.org/>

December 1, 2015

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

Re: Sulfoxaflor

*The following comments are being submitted in regard to the decision by the 9<sup>th</sup> Circuit Court of Appeals to cancel EPA's registration of sulfoxaflor. These comments are being submitted on behalf of the Western IPM Center and provide input on the use of sulfoxaflor in Pacific Northwest commodities.*

Although a relatively new product, sulfoxaflor has already established itself as an effective and reduced-risk management tool for controlling many major pests across several PNW industries, including alfalfa seed, potatoes, apples, ornamentals, and conifer nurseries. More detailed information is included here regarding its current use status in several of these industries.

#### **Alfalfa seed:**

Substantial effort went into acquiring the 24C registration for Sulfoxaflor, approved first in Washington and Idaho, and subsequently in Oregon, Utah, and Colorado. It is estimated that over half the alfalfa seed acreage in the 5 states that sulfoxaflor was permitted by 24C (Washington, Idaho, Oregon, Utah, Colorado) was treated with this product in 2015. As growers learn to minimize any adverse impacts to bees and gain familiarity with the product, its use would likely increase in future years.

A permanent sulfoxaflor cancellation would be potentially devastating to alfalfa seed growers, and without this product, growers would be forced to increase their reliance on other products such as Naled and pyrethroids during mid-to late bloom, resulting in an increased threat to managed and unmanaged pollinators in alfalfa seed.

Sulfoxaflor provides very effective Lygus bug control during late bloom, while causing minimal harm to pollinating leafcutting, alkali, and honey bees as shown during the 2015 season (Doug Walsh at WSU has more information on this statement). The main insecticide sulfoxaflor is displacing for alfalfa seed growers is naled, an organophosphate that poses more risk to the bees than sulfoxaflor, while also not as effective as sulfoxaflor at killing pests such as Lygus bug. Thus, this product was proving to be a more effective and reduced-risk product for growers.



**Integrated Plant Protection Center**  
**Katie Murray, Faculty Research Assistant**  
2040 Cordley Hall, Corvallis, Oregon 97331-2915  
Tel: 541-231-1983 | Fax: 541-737-3080  
[murramar@science.oregonstate.edu](mailto:murramar@science.oregonstate.edu)  
<http://ipmnet.org/>

### **Potatoes:**

On potatoes in the PNW (Washington, Oregon, and Idaho), it was estimated that 60,000 acres were treated with sulfoxaflor this season. Many insecticides are labeled for use on potatoes, but very few offer the spectrum of control on key insect pests that sulfoxaflor does. It was anticipated that this product would be used widely for leafhopper, psyllid, and aphid control during the middle of the season on potatoes. Currently, pyrethroids fill that niche, but pyrethroids are not recommended during that time period, as they tend to flare spider mites, psyllids, and sometimes aphids, leading to more late season insecticide and miticide applications.

### **Apples:**

Sulfoxaflor in the "Closure" formulation would have evolved into an important insecticide for control of wooly apple aphid on apples. Wooly apple aphid is a very difficult pest to control, and is a pest that has increased in importance after the final phase-out of azinphos-methyl.

For more information, please feel free to contact me and I will connect you with representatives from each of the industries mentioned here.

Respectfully,

Katie Murray

Research Assistant, Extension IPM  
Integrated Plant Protection Center  
Oregon State University  
phone: 541-231-1983  
email: [murramar@science.oregonstate.edu](mailto:murramar@science.oregonstate.edu)