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MĀNOA

June 17, 2016

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

Subject: **Docket ID Number EPA-HQ-OPP-2010-0889**
Comments in Response to *Public Participation for New Active Sulfoxaflor*

The following comments are being submitted in regard to the *Proposed Registration of Sulfoxaflor for Use on Agricultural Crops, Ornamentals and Turf*, posted to Regulations.Gov on May 17, 2016. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on a potential use of sulfoxaflor on **macadamia nuts** in Hawai'i.

Sulfoxaflor has been under evaluation by a macadamia nut grower for potential use against the macadamia feltid coccid (*Eriococcus ironsidei*/Williams). Comments regarding the proposed registration of sulfoxaflor were submitted by representatives of Royal Hawai'i Orchards LP. These comments are appended, below.

Comments submitted by:

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COMMENTS ON THE PROPOSED REGISTRATION OF SULFOXAFLOR

1. Only post bloom applications allowed

Restricting applications in macadamia nuts to post bloom periods does not allow us to apply the product when it is most effective to control the Macadamia Felted Coccid. The most effective time to spray is when the immature coccid populations first start to increase which is not during the post bloom period. We already notify the bee keepers in our area whenever we apply other chemicals so they can either remove their hives or take steps to protect them. To minimize the effects on honey bees, we could also restrict applications to times when they are less active.

2. Applications must be made with medium to coarse spray nozzles

We are making applications in trees that are over 50 feet tall with dense canopies using air blast sprayers. Medium or coarse sprays will not penetrate the canopies or reach the tops of the trees. This would make applications ineffective. Furthermore, this restriction is unnecessary if the bees have been removed or otherwise protected.

3. Downwind 12 foot buffer

Leaving a buffer would leave an active reservoir of pests, allowing for a rapid re-infestation of the fields. Our notifications to the bee keepers should keep the blooming areas adjacent to the field bee free.

4. Restrictions on tank mixing

We presently do not add any other insecticide to the sulfoxaflor mix; but if we needed to control an additional pest, tank mixing will be a valuable option. Not only from an economic stand point, but to reduce our carbon footprint and our use of resources. I think the restriction on mixing assumes that there may be a synergistic effect; but until this assumption is shown to be correct, mixing should not be prohibited. If an adverse synergistic effect with a particular product or class of products can be shown, then restrictions should be limited to that particular mix of products.