

Subject: Docket ID number OPP-2005-0230  
December 16, 2005

Comments in response to: *Tau-fluvalinate; Reregistration Eligibility Decision for Low Risk Pesticide; Notice of Availability, Federal Register Notice* November 16, 2005  
(Volume 70, Number 220) [OPP-2005-0230; FRL-7742-7]

The ornamental agriculture industry in Hawai'i uses tau-fluvalinate (Mavrik Aquaflow<sup>®</sup>, EPA Reg. No. 2724-478) for a wide variety of crops, including orchid, *pikake* (jasmine), ginger, heliconia and others. It is used as both a miticide and an insecticide for a number of pests.

However, the most common and most important use is for dip treatment for cut flowers and foliage, in rotation with other pesticides. Flower exporters, particularly orchid growers/shippers use tau-fluvalinate as a post-harvest, pre-shipment dip. Growers and exporters of orchids and other relatively high value commodities, and growers can afford to use and dispose of the relatively expensive but very effective Mavrik Aquaflow<sup>®</sup>.

Tau-fluvalinate is also important to ornamental producers because it is a non-restricted pyrethroid for nursery use.

To a lesser extent, tau-fluvalinate is used as a spray in the ornamental industry in shade houses, greenhouses, fields and packing plants for broad spectrum control of insects. Tau-fluvalinate and the only other non-restricted pyrethroid, cyfluthrin (Decathlon)--are also used as alternative chemistries for resistance management.

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