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July 7, 2017

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Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2012-0501**

Comments in Response to *Tefluthrin Registration Review: Draft Human Health and Ecological Risk Assessment*

The following comments are being submitted in response to the November 29, 2016 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft human health and ecological risk assessments for the registration review of tefluthrin and the May 8, 2017 *Federal Register* notice extending the comment deadline. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of tefluthrin use in the production of seed crops in Hawai'i.

Planthoppers and lesser cornstalk borers are an important pests of corn at some locations in Hawai'i. During periods of high pest pressure, there have been incidences of complete crop failure. Fields are scouted for crop injury levels. Tefluthrin is applied after an economic injury level is exceeded, during early vegetative growth and or in the late reproductive growth stage of the crop. To control these pests, the typical application pattern is one application of 4.2 lb/acre per crop cycle. (A crop cycle is four months. One corn crop is planted in a field per year. The field is planted in cover crops or fallow for the between corn crops.) Effective alternative chemicals, with different modes of action, to control these pests are not available.

Comments regarding the use of tefluthrin were received from a representative of the seed crop production industry.

Comments compiled and submitted by:


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