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Subject: **Docket ID Number EPA-HQ-OPP-2013-0187,**
Case Number 7027
Comments in Response to ***Fenhexamid*** *Registration Review: Draft Human Health and /or Ecological Risk Assessments*

The following comments are being submitted in response to the May 24, 2018 Federal Register notice announcing the availability and seeking public comments for EPA's proposed interim registration review decision for Fenhexamid. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on available use data of Fenhexamid for blueberries grown in Hawaii.

Blueberry is considered a minor crop in Hawaii. The potential for blueberries as a high-value crop in the state was first investigated in 2004 through a joint effort of the University of Hawaii and USDA-ARS. Three major challenges to growing blueberries in Hawaii were identified, such as feeding damage by certain bird species, unsuitable soil conditions (thus the recommendation of growing blueberries in pots), and incidence of fungal diseases such as blueberry rust infecting the leaves and Botrytis blight causing premature browning and necrosis of infected flowers and fruits.

Fenhexamid (Elevate 50 WDG) is used on blueberry mainly for the fungal control of Botrytis blight (*Botrytis cinerea*) or gray mold. The application rate for this fungicide is 1.5 lb ai/A with maximum of 4 applications/ acre/ season. The application interval greatly varies depending on the growers and conditions. Because Fenhexamid is effective for Botrytis blight and the label allows only 4 applications/ season, the grower will tend to apply when needed, most particularly under cool and moist conditions that favor fungal growth. Fenhexamid is also used in a rotation with other fungicides from other mode of action groups, such as Serenade (*Bacillus subtilis)*, Regalia (plant extract of *Reynoutria sachalinensis*), OSO (Polyoxin D zinc salt) and Abound (Azoxystrobin), to reduce the possibility of resistance selection. Alternative management strategies for Botrytis include sanitation through removal or pruning of infected plant parts, moisture management and increased distance of planting.

Comments were received from the Big Island Extension agent of the College of Tropical Agriculture and Human Resources (CTAHR) of the University of Hawaii at Manoa.

Comments compiled and submitted by:

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