



Integrated Plant Protection Center
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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001
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Re: EPA-HQ-OPP-2011-0677, Pyriproxifen Registration Review

The following comments are submitted to provide usage information from Pacific Northwest commodities to support EPA's registration review of pyriproxifen. These comments are being submitted on behalf of the Western IPM Center.

Pyriproxifen is a commonly used insecticide in Pacific Northwest commodities including but not limited to tree fruits, tree nuts, wine grapes, berry crops, and alfalfa. It is considered a go-to product for controlling scale insects, and also very important for controlling other insect pests such as aphids, filbertworm, leafroller, mealybug, mites, and pear psylla.

While it is used in most berry crops, pyriproxifen is a critical product in blueberry production for controlling scale insects. Growers use pyriproxifen as a replacement for diazinon for controlling this pest and there are currently no other effective alternatives. Pyriproxifen is typically applied 1-2 times per season in blueberries to control scale, in combination with horticultural oil, either during dormancy (December/January) to target overwintering females, or at budbreak to control insect crawlers. Both of these timings are well before bloom. Despite its relatively short PHI, it is not often used later in the season, as other efficacious alternatives are available for controlling later season pests.

In hazelnuts, pyriproxifen is used only occasionally. It is sometimes used as an alternative to chlorpyrifos to control leafroller, but Bt (*bacillus thuringiensis*) and spinosyns are also efficacious alternatives for this pest. For use on leafroller, risk to pollinators would be very low, as the timing would be well after bloom, and hazelnut bloom generally does not attract pollinators. However, if pyriproxifen is used later in the season to control aphids, bees could be present in orchards due to the presence of aphid honeydew, so this risk would need to be mitigated.

Until the small fruit and tree fruit industries develop an effective IPM plan for controlling spotted wing drosophila (SWD), this product could become more essential for controlling secondary pests –or pests that flare up due to the negative impacts to beneficials of the currently available options (often pyrethroids) for controlling SWD.



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Although registered, pyriproxifen is currently not used in potatoes due to the availability of alternatives with lower costs and higher efficacy. However, there is concern in the Pacific Northwest that potato insect resistance could develop to these alternative products, such as Group 3 and 4 insecticides, and in other potato growing regions, pyriproxifen has shown efficacy against insecticide resistant potato psyllids. If resistance does develop in the Pacific Northwest, the use of this product could become important for growers.

Respectfully,

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Katie Murray is the Western IPM Center's Information Network Coordinator for the Pacific Northwest. Katie has expertise in agricultural stakeholder engagement and assessment methods related to understanding pesticide usage and pesticide compatibility with IPM.

The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.

To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect agricultural stakeholder feedback and do not imply endorsement by Oregon State University or the Western IPM Center.