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Electronic Submission

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Docket ID No. EPA-HQ-OPP-2010-0889 *“Conditional Registration of Sulfoxaflor”*

Western Growers is pleased to have the opportunity to provide comments in support of the expeditious registration of sulfoxaflor for use on vegetables (bulb, cucurbit, leafy, root and tuber), low growing berry, pome and stone fruit, citrus, pistachio and tree nuts as well as other key agricultural commodities. Western Growers is a non-profit trade organization that represents growers and handlers of fresh fruits, nuts and vegetables in California and Arizona. Our members produce over half the United States fresh produce and as such are acutely interested in new and emerging crop protection tools and technology.

Cole crops and leafy vegetables are two crop groups which are extremely important to our members. Control of aphids, whiteflies and other pests is necessary to produce a marketable and profitable crop.

Some of the products our industry has relied on for years to control aphids have either been phased out or restrictions have been added to labels making them more difficult to use. The registration of new, effective aphid control products is critical for continued production of these crops. Research data from University of California and University of Arizona demonstrate that Closer Insecticide provides excellent control of all aphid species damaging cole crops and leafy vegetables. Closer is used at a very low use rate. The proposed use parameters such as the pre harvest interval and restricted entry interval for this product are very compatible with the production systems used by our grower members.

Another key pest in leafy vegetables, cole crops as well as melons and fruiting vegetables is whitefly. Whitefly feeding produces honeydew which can make harvest difficult and reduce quality. Whitefly also transmits plant viruses which can dramatically reduce crop yield and quality. Effective control of whiteflies is a must for producing high quality crops, especially in desert production areas where whitefly populations can be very damaging. Whiteflies have demonstrated an ability to develop resistance to insecticides very quickly so it is important to have multiple modes of action available. Research data from University of Arizona has shown that Closer is effective in controlling whitefly and has been demonstrated to reduce virus incidence in fall melons.

Due to restrictions and removal of some key insecticides in strawberries such as Lannate (methomyl), insect pest management has become more challenging. One of the most serious pests is Lygus. This insect can cause great losses for strawberry growers from feeding on developing flowers resulting in malformed fruit which is unmarketable. Left untreated, losses of greater than 50% of the crop are possible. Research trials conducted in 2012 by the CA Strawberry Commission in conjunction with University of California demonstrated significant increases in marketable yields. Closer will be a critical tool for growers in controlling this challenging pest.

We understand that some crops have language restricting use during and around bloom. In crops like melons and strawberries bloom occurs early and throughout a large part of the life cycle of the plant. Therefore, it is critical to have flexible application restrictions to be able to effectively use this and other products. The insect control spectrum of Closer paired with its unique mode of action make it an important new tool for our growers.

We respectfully request that the USEPA move forward to register the use of sulfoxaflor for use in California and Arizona fruit, nut and vegetable commodities as rapidly as feasible. We see this compound as an important new tool in a limited and increasingly restricted arsenal of effective pesticides to combat key agricultural pests such as aphid, whitefly and lygus. In the interim, I would be pleased to answer any questions you may have about Western Growers and/or our support for this important product.

Thank you for the opportunity to comment.

Respectfully,



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