



Response to EPA Proposed Interim Decision for Buprofezin

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May 17, 2019

U.S. Environmental Protection Agency
OPP Docket, EPA Docket Center (EPA/DC), 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Buprofezin, EPA Docket ID: EPA-HQ-OPP-2012-0373, Comments on EPA Proposed Interim Decision

To Whom It May Concern:

The Arizona Pest Management Center is host to the University of Arizona's expert IPM scientists including Ph.D. entomologists, weed scientists and plant pathologists with expertise in the strategic tactical use of pesticides within IPM programs that protect economic, environmental and human health interests of stakeholders and the society at large. In coordination with the Western Integrated Pest Management Center, we contribute to federal comments on issues of pest management importance to stakeholders throughout the desert southwest including Arizona, New Mexico, Nevada, Colorado and the southeast desert regions of California.

At this time, we wish to respond to the Agency's Proposed Interim Decision for the insecticide buprofezin, EPA Docket number EPA-HQ-OPP-2012-0373, on behalf of agricultural stakeholders. In doing so, we wish to incorporate by reference our previously submitted EPA comment from 2012, identified by docket ID number EPA-HQ-OPP-2012-0373-0008. Herein, we summarize key points from this document and add new information. The entirety of our comments combine stakeholder input received from University of Arizona Extension Specialists, licensed pest management professionals from Arizona, and reported use data for buprofezin from the Arizona Pest Management Center Pesticide Use Database.

Summary from prior Buprofezin comments (2012):

Buprofezin is a key, selective compound with an impeccable history of safe and effective use in Arizona agriculture. It is used on more than 22 different crops primarily for the control of whiteflies and the viruses they vector. The main crops grown in Arizona that depend on buprofezin in one or more product formulations include cotton, melons of all types, lettuces of all

types and cole crops. 82% of buprofezin sprayed acreage is cotton, where Courier is an important product that serves a major role in IPM programs designed to conserve natural enemies. Buprofezin along with other selective chemistries has been part of a revolution of practice in cotton IPM, replacing broadly toxic pyrethroids, organophosphates, carbamates and endosulfan. Buprofezin provides a unique chemistry to a diverse program of whitefly management across multiple crops, where growers have established landmark agreements to share and conserve this and other chemistry to avoid resistance. The current labels for buprofezin are needed and appropriate to the use of these products. The Arizona Pest Management Center, host to the University of Arizona's expert IPM scientists and a unique historical pesticide use database, supports the continued safe and effective use of buprofezin in multiple Arizona crops as part of comprehensive IPM programs designed to protect economic, environmental and human health interests.

Comments on EPA's Proposed Interim Decision, Buprofezin: EPA-HQ-OPP-2012-0373

The general use patterns identified in our previous comments have remained consistent in recent years, with cotton, lettuce and melons being the most significant uses by acre in Arizona. The majority of cotton applications are made by air. Reported uses in lettuce tend to split between ground and aerial application methods, with a majority of acres treated by ground most years.

Application Method Restrictions

EPA's proposed removal of all WSP formulations from backpack and aerial use does not appear to be problematic for Arizona producers. Nichino switched over to a 40 SC formulation in cotton several years ago here. Likewise, a review of registered labels across crops in Arizona do not indicate the use of WSP formulations.

Based on input from a prominent pest control advisor who works with grape growers, air blast sprayers are the primary method used for foliar insecticide applications in the vineyard industry in Arizona. The specific restrictions proposed would not be problematic.

Enforceable Spray Drift Requirements

To reduce non-occupational spray drift exposure, EPA proposes a requirement for medium or coarser droplet sizes for aerial and ground applications for all crops; for aerial applications, a 10-foot buffer will be required if using medium droplet size.

Enforceable Spray Drift management requirements outlined in the PID do not appear to pose major concerns for lettuce, cole crops or melon crops in Arizona. Likewise, for cotton, these requirements do not appear problematic, based on input from University of Arizona experts and pest control advisors. However, because most buprofezin applications to cotton must be made by air to control whiteflies after the canopy closes, we wish to clarify the proposed 10-foot buffer requirement when medium droplet size is used. In general, implementation of a the 10-foot buffer is not expected to be an issue for cotton aerial applications, as every field has at least 10 ft of space in head rows, tails, roads, ditches or similar areas directly under the control of the grower.

In summary, we have not identified any major concerns with the proposed changes.

Who We Are

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Dr. Al Fournier is Associate Director of the APMC / Adjunct Associate Specialist in Entomology, holds a Ph.D. in Entomology, and has expertise in evaluating adoption and impact of integrated pest management and associated technologies. He serves as a Southwest Region IPM Network Coordinator for the Western IPM Center, representing stakeholders in the desert Southwest states. Dr. Peter Ellsworth is Director of the APMC, State IPM and Pesticide Coordinator for Arizona and Professor of Entomology / Extension IPM Specialist with expertise in developing IPM systems in cotton and other crops and measuring implementation and impact of IPM and pest management practices. Mr. Wayne Dixon holds a B.S. in Computer Information Systems and develops tools and data used in IPM research, education and evaluation, including management of the APMC Pesticide Use Database.

These comments are the independent assessment of the authors and the Arizona Pest Management Center as part of our role to contribute federal comments on issues of pest management importance and do not imply endorsement by the University of Arizona or USDA of any products, services, or organizations mentioned, shown, or indirectly implied in this document.

Our Data and Expert Information

Through cooperative agreements with Arizona Department of Agriculture, the Arizona Pest Management Center obtains use of, improves upon, and conducts studies with ADA's Form L-1080 data. Growers, pest control advisors and applicators complete and submit these forms to the state when required by statute as a record of pesticide use. These data contain information on 100% of custom-applied (i.e., for hire) pesticides in the state of Arizona. Grower self-applied pesticide applications may be under-represented in these data. In addition, the Arizona Pest Management Center is host to scientists in the discipline of IPM including experts in the usage of this compound in our agricultural systems. We actively solicit input from stakeholders in Arizona including those in the regulated user community, particularly to better understand use patterns, use benefits, and availability and efficacy of alternatives. The comments within are based on the extensive data contained in the Arizona Pest Management Center Pesticide Use Database, collected summary input from stakeholders and the expertise of APMC member faculty.