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Office of Pesticide Programs
Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

RE: Docket ID Number EPA-HQ-OPP-2010-0889
Registration Petition for Sulfoxaflor

To Whom it may concern:

I would like to provide comments in regards to the registration petition submitted to EPA for a the new insecticide compound sulfoxaflor developed by Dow AgroSciences, LLC. I am currently a Professor of Entomology and Extension Specialist with the University of Arizona and have been conducting applied research and outreach programs for the past 20 years at the Yuma Agricultural Center in Yuma, AZ. I have had the opportunity to evaluate the efficacy of sulfoxaflor against a number of key insect pests on leafy vegetables and cucurbits for the past 3 years. Based on my experiences thus far, and my understanding of its toxicological profile, sulfoxaflor appears to be an excellent alternative to many of the insecticide products presently available to western vegetable growers.

Arizona and California are the leading producers of leafy vegetables in the US. In both the coastal and desert growing regions, insect management is one of the primary constraints to economic production that growers face. In particular, aphids are major threat to these crops and often require multiple pesticide applications to prevent losses in yield and quality. These pests are presently managed through an integrated approach that stresses avoidance through cultural practices. However, these tactics do not work effectively by themselves. Biological control is not practical, and is not used primarily because of the market demands for insect-free produce. Consequently the produce industry relies on a number of insecticide alternatives to provide an inexpensive and quality product. On average, growers will apply 4 applications (sometimes more under heavy pressure) during a crop season to control a complex of aphid species. To date, spirotetramat is the most commonly used, followed by the neonicotinoids. Among the older products, growers typically use combinations of endosulfan, acephate,