



Arizona Farm Bureau Federation

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June 16, 2016

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environment Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

RE: Docket No. EPA-HQ-OPP-2010-0889 Proposed Registration Decision for Sulfoxaflor

To Whom It May Concern:

Good soils, climate, and water are the primary inputs that have provided Arizona farmers the ability to grow a wide variety of crops. As a whole, Arizona agriculture is a \$17.1 billion industry. The proposed registration decision for sulfoxaflor will have a negative impact on the agricultural sectors who rely on this product to control a variety of pests. We are disappointed that the EPA is choosing not to include a number of indeterminate blooming crops including cotton and citrus, as well as prohibiting its use on crops grown for seed production in the proposed registration decision.

Of the state's 15 counties, cotton is grown in 9 and continues to be an important agricultural commodity. Arizona cotton yields are consistently twice the national average and contributes \$400 to \$500 million annually to the state's economy. Citrus and seed crop production are important economic drivers in the areas of the state where they are grown.

Sulfoxaflor is an important pest management tool for Arizona farmers growing these crops, and we strongly urge the EPA to reconsider its decision to remove cotton, citrus, and crops grown for seed production from the registration. Additionally, we believe the agency has failed to meet its obligation under FIFRA which requires a risk-benefit assessment. Instead it seems as though the EPA has chosen to take a precautionary position not supported by exposure data.

Cotton

Cotton farmers today face a number challenges including commodity prices being at their lowest point in years, rising input costs, and increasing global competition. Added to this are the day to day challenges of dealing with weeds, insect and disease pests, and weather. By

removing an important crop protection tool, the EPA is restricting producers' ability to manage insects and diseases efficiently and effectively.

Arizona maybe the only place in the world where cotton growers must deal simultaneously with both *Lygus* bugs and *Bemisia* whiteflies. *Lygus* bugs have been the number one yield-limited pest of cotton since 1998. According to the Arizona Pest Management Center, sulfoxaflor is among the most effective insecticides ever screened for the control of *Lygus*.¹ Additionally they note, *Lygus* are often the first in-season cotton pest sprayed for and by using sulfoxaflor at this stage, provides collateral suppression of whiteflies and potentially delays or eliminates additional sprays.

Other products such as acephate and oxamyl are available to control *Lygus* bugs, but in contrast they are broadly toxic and less safe. Sulfoxaflor is the much safer alternative with respect to beneficial insects and other arthropods, as well as to those applying the pesticides. Furthermore, other alternatives to sulfoxaflor do not provide the same collateral benefits to whitefly supersession, and in the case of acephate and oxamyl tend to flare whiteflies by killing their natural enemies.²

Another concern for Arizona cotton growers is whitefly and *Lygus* bug resistance. Sulfoxaflor has been an important product to use in rotation with other products to help address and prevent resistance. By removing access to sulfoxaflor, resistance pressures will escalate.

Citrus

Sulfoxaflor is currently not widely used by Arizona citrus growers, although it is still an important product to have available. Presently sulfoxaflor is an option for the control of citrus mealybug, wooly whitefly, and Red scale. It is also used to control Asian Citrus Psyllid (ACP). Recently the entire state of Arizona was quarantined for ACP. To date the primary products used to treat ACP in the state are Delegate (spinetoram) and Agri-Mek (abamectin), because they also control citrus thrips and mites. However, the availability of sulfoxaflor as an alternative chemistry is of importance should resistance to the current products become an issue.

Seed Crops

Certain seeds crops grown in Arizona, in particular brassica and alfalfa crops, also benefit from the use sulfoxaflor. Growers have found sulfoxaflor to be a particularly effective product in controlling aphid and *Lygus*.

¹ Arizona Pest Management Center. "Sulfoxaflor Impacts on Arizona Agriculture." Prepared by Peter C. Ellsworth. Feb. 12, 2013. Available at http://ag.arizona.edu/apmc/docs/Sulfoxaflor_APMC_2-12-13.pdf. Accessed May 25, 2016.

² Ibid

Bees

The EPA notes it is not including a number of indeterminate blooming crops and crops grown for seed production in the proposed registration to protect bees. This decision appears to be based on a precautionary approach that is not linked to empirical data demonstrating that it will protect pollinators. Furthermore, in some instances, the alternatives to sulfoxaflor may pose a greater risk to bees and pollinators. The EPA should consider mitigation language in the label that addresses exposure concerns and accordingly diminishes the risk.

As a general farm organization, our membership also includes beekeepers. In comments we previously filed with the agency regarding its proposal on managed honey bees present under contract for pollination service, we noted it is common practice for growers to communicate with beekeepers to mitigate pesticide exposure to bees. By providing growers, beekeepers and pest control advisors with various chemistries to treat pests, they can cooperatively work together to choose the best product that deals with the issue at hand while minimizing exposure to bees. Arizona is also working towards the development of a Managed Pollinator Plan to further increase and formalize communication between growers and beekeepers to further minimize the risk of acute pesticide exposure to bees. The EPA has failed to evaluate current practices to protect bees and state MP3 as methods to mitigate bee exposure.

Conclusion

As a member of the American Farm Bureau Federation, we support the comments they have prepared regarding the registration of Sulfoxaflor. We also support the comments submitted by the Arizona Pest Management Center and the National Cotton Council.

We believe sulfoxaflor should remain a viable pest management option for cotton, citrus, and crops grown for seed production and request the agency reevaluate its decision.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Rogers". The signature is fluid and cursive, with the first name "Kevin" and last name "Rogers" clearly distinguishable.

Kevin Rogers, President
Arizona Farm Bureau Federation