



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

November 13, 2017

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2008-0844; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Imidacloprid

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessment of the neonicotinoid, imidacloprid, as we believe it does not fully recognize the critical role this chemistry provides to the success of a number of Arizona's agricultural crops.

Imidacloprid is used in the production of a number of crops in Arizona including cotton, citrus, leafy vegetables, cole crops, melons, and seed crops. A recent study conducted by the University of Arizona found that imidacloprid is applied as soil systemic on more than 85% of the lettuce acres in Arizona to control both whiteflies and aphids.¹ The primary growing area for leafy vegetables is Yuma, Arizona, which is also known as the "Winter Lettuce Capital of the U.S.," producing over 90% of the nation's winter supply. According to Dr. John Palumbo, Research Scientist and Extension Specialist at the University of Arizona, there are other alternatives to imidacloprid, but they are not as effective and are much more expensive to use. Additionally, he notes that if growers were to lose the use of imidacloprid on lettuce and cole crops the cost of production would increase significantly. Growers would be forced to rely on multiple foliar spray applications, and the use of pyrethroids, organophosphates, and carbamates, all broad-spectrum insecticides and older chemistries, would increase greatly.

It would not be hyperbole to suggest that the first approved uses of imidacloprid in fall vegetable production in Yuma, Arizona, in 1993 was keystone to saving the industry from collapse there². Today, it

¹ Palumbo, John C., "2015 Insecticide Usage on Arizona Lettuce," UA VegIPM Update, Vol. 6, No. 12, June 10, 2015, http://ag.arizona.edu/crop/vegetables/advisories/docs/061015_Insecticide_Usage_Summary_in_Lettuce_2015.pdf

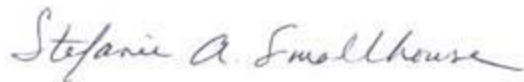
² Palumbo, J. C., Horowitz, A. R., and Prabhaker, N. (2001). Insecticidal control and resistance management for

still functions to maintain plant health in the face of large populations of whiteflies immigrating from other source summer crops. Furthermore, the University of Arizona under Dr. John Palumbo's leadership has developed, promoted and maintained landmark neonicotinoid sharing agreements among cotton, melon and vegetable growers.³ These guidelines are referred to worldwide as models for proactively organizing agricultural stakeholders around common goals of product stewardship and resistance management.

The use of imidacloprid is also critical in the movement of citrus nursery stock. Because of the Asian Citrus Psyllid found in certain parts of Arizona, citrus nursery stock within the quarantine areas are treated with imidacloprid prior to out-of-state shipment. Furthermore, according to Brian McGrew, Quarantine Program Coordinator, Plant Services Division of the Arizona Department of Agriculture, imidacloprid is also an important tool for the citrus growers because of maximum residue levels that restrict the use of certain alternative products in some markets. He also notes the importance of maintaining imidacloprid as a tool to protect the Arizona citrus industry against potential infection from citrus greening (Huanglongbing), and also as another product to rotate to, for resistance management.⁴

Imidacloprid is an important tool for many growers in our state and we do not believe that this product, which has been used for many years, poses an unreasonable risk to human health or the environment. All crops grown in Arizona on which imidacloprid is used would be negatively impacted if it were no longer available as a crop protection tool. For those reasons, we urge the EPA to continue to allow its use.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation

Bemisia tabaci. Crop Protection 20: 739-765.

³ Palumbo, J. C., Ellsworth, P. C., Dennehy, T. J. and Nichols, R. L. (2003). Cross-Commodity Guidelines for Neonicotinoid Insecticides in Arizona. IPM Series 17. Publ. No. AZ1319. University of Arizona, College of Agriculture and Life Sciences, Cooperative Extension, Tucson, Arizona. 4 pp. URL:

<http://arizona.openrepository.com/arizona/handle/10150/146722>

⁴ Fournier A.J., P.C. Ellsworth, W.A. Dixon II. 2016 Imidacloprid Use in Arizona Citrus. University of Arizona, Arizona Pest Management Center. http://ag.arizona.edu/apmc/docs/Imidacloprid-Use-In-Arizona-Citrus_4-14-16.pdf.