



Arizona Farm Bureau Federation

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Gilbert, AZ 85296

November 21, 2017

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

RE: EPA-HQ-OPP-2011-0666 and EPA-HQ-OPP-2011-0667; Registration Review Proposed Interim Decisions: Spinetoram and Spinosad

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. With regard to the Environmental Protection Agency's Proposed Interim Decisions, our comments below highlight the critical role that spinetoram and spinosad provide to the success of a number of Arizona's agricultural crops.

Spinetoram and spinosad are used on many of Arizona's crops including leafy vegetables (i.e. lettuce/leafy greens), cole crops, citrus (spinosad only), and melons (spinetoram only). Approximately 95% of the leafy vegetables consumed in the U.S. from November to March are produced in Arizona. With regards to melons, the state ranks second in the nation in cantaloupe and honeydew production. The volume of these commodities grown in Arizona highlights the importance of preserving spinetoram and spinosad as crop protection tools.

According to Dr. John Palumbo, spinetoram and spinosad are the most valuable insecticide alternatives currently available to conventional and organic vegetable growers in the western U.S. for managing Lep larvae (i.e. beet armyworm, cabbage looper, corn earworm), western flower thrips, and Liriomyza leafminers. He goes on to mention several reasons why growers are reliant on these products:

- Consistently efficacious and reliable
- Provide tremendous safety and flexibility in their use because they essentially have no human health concerns
- Excellent insect control due in part to their translaminar route of action
- Play an important role in insecticide resistance management (IRM) of Lep larvae
- Spinetoram is critical for thrips IRM because of the lack of effective modes of action to rotate to
- Production of organic leafy vegetables in the desert would be extremely difficult due to the lack of alternatives that provide comparable activity against Lep larvae and thrips

- If growers had to rely on alternatives other than spinosad, it is highly likely that the acreage of organic leafy vegetables in the desert southwest would significantly decrease

EPA is proposing new label language in the Proposed Interim Decision to protect pollinators. In the case of leafy greens and melons, this language may not be necessary. Leafy vegetable crops do not flower during the production season; therefore, pollinator exposure should not be a concern. It is also worth mentioning that spinetoram and spinosad are not used on vegetable seed crops. In melons, which are cucurbits and continuously flowering plants, applications of spinetoram and spinosad are made in accordance with label instructions, meaning they are not applied "to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period." Consequently, applications are made at night when bees are not foraging.

We do not support any changes that would significantly inhibit the use of spinetoram and spinosad in Arizona's crop production systems. These tools have been used for many years with no proof they pose any unreasonable risk to human health or the environment. We strongly encourage the EPA to consider the extremely safe track record and economic importance of spinetoram and spinosad as it proceeds with the registration review of these products.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation