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

RE: EPA-HQ-OPP-2011-0677; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – pyriproxyfen

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 pyriproxyfen, 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.

Pyriproxyfen is an insect growth regulator (IGR) that has been an important component of integrated pest management programs in Arizona for the last two decades and is especially useful for famers growing cotton and melons. These two crops add significant value to Arizona's agricultural receipts. 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. Arizona is also a major melon producing state and ranks second in the nation in cantaloupe and honeydew production. USDA National Agricultural Statistics Services estimates Arizona 2017 melon production value at nearly $128 million (all types).

Cotton

Whitefly infestations can be especially damaging to cotton. They reduce yields by damaging leaf tissue and stunting plant growth. However more problematic for a crop like cotton is the honeydew whiteflies secrete, which often leads to black moldy fungus growth on cotton bolls. IGRs, like Pyriproxyfen, are often the first line of defense against whitefly infestations and provide chemical and bio-residual that are selective and safe for beneficials.[1] The importance of pyriproxyfen in whitefly control is also

[1] Ellsworth, Peter C. 2004. Whitefly Control in Cotton: Getting the Fundamentals!, University of Arizona, College of Agriculture and Life Sciences, Cooperative Extension, Tucson, Arizona. URL: https://cals.arizona.edu/crop/cotton/insects/wf/wffund0804.pdf.

highlighted by the fact that other chemical approaches are advised for short-term control scenarios and only after IGRs have been used first.[2] An important reason for this is that pyriproxyfen offers effective and highly selective control of whiteflies in cotton, preserving a suite of natural enemies which help to suppress other insect pests. This preservation of natural enemies is a cornerstone of effective cotton IPM programs in Arizona.

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

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. It is important that growers retain crop protection tools, such as pyriproxyfen, to preserve their ability to manage insects and diseases efficiently and effectively.

Melons

Pyriproxyfen has also been an important product for addressing whitefly damage in melon production. Whitefly is a vector for cucurbit yellow stunting disorder virus (CYSDV) which causes a yellowing of leaves, reduced plant growth, and smaller, less desirable fruit. Melons grown in Arizona make up a significant portion of the melons produced in the United States. According to 2014 United States Department of Agriculture National Agricultural Statistics Service, Arizona ranks second to California in the production of cantaloupes and honeydews. Therefore, ensuring growers have access to products such as pyriproxyfen to combat pest and disease that reduce production and yield levels is vitally important.

We believe pyriproxyfen should remain a viable pest management option for Arizona's cotton and melon producers. It is an effective crop protection tool that in addition being and excellent fit in IPM programs, is slow acting with a long residual, safe to beneficial insects, and non-toxic to humans and wildlife.[3] We strongly encourage the EPA to consider the extremely safe track record and the economic importance of pyriproxyfen to Arizona's farmers as it conducts its human health and ecological risk assessment.

Sincerely,

Stefanie A. Smallhouse

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

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[2] Ibid

[3] Palumbo, J.C. 2001. Review of New Insecticides Under Field Development for Desert Vegetable and Melon Production. University of Arizona, College of Agriculture and Life Sciences, Cooperative Extension, Tucson, Arizona. URL: http://cals.arizona.edu/crops/vegetables/insects/general/reviewinsect.html