The IR-4 Project
Pest Management Solutions
for Specialty Crops and
Minor Uses

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March 28, 2016

Mr. Jack E. Housenger, Director,
Office of Pesticide Programs
c/o OPP Docket
Environmental Protection Agency Docket Center (EPA/DC)
Mail Code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Housenger,

These comments are being submitted on behalf of the IR-4 Project in response to EPA's Notice of Intent to Cancel the important insecticide flubendiamide.

As you know, the IR-4 Project is a unique federal/state cooperative research program in the United States that is funded by the US Congress to develop data to support registrations of crop protection products on specialty crops and minor uses. IR-4 is part of the Land Grant University system and works closely with the Environmental Protection Agency to ensure that specialty crop farmers have access to safe and effective pesticides to manage pests on their crops that feed the public with healthy fruits and vegetables.

IR-4 fully supports the US regulatory framework, established by Congress and EPA, to license the use of crop protection products. We fully understand that the standards for human health is based on a reasonable certainty of no harm to humans and the environment they live in. That includes many considerations including environmental exposure, risk/benefit assessment etc. However, it seems that in the move to cancel the flubendiamide registration, a risk/benefit assessment was not completed with consideration of the need for this product in specialty crop production. The IR-4 Project was not consulted for benefits information and to the best of our knowledge, neither were our colleagues at USDA's Office of Pest Management and Policy or any of the specialty crop commodity associations.

Therefore, we believe that the benefits to specially crops should be considered and reasonable efforts made to ensure that all benefits data from other creditable sources are considered. As a summary, IR-4 has received 21 Requests for Assistance from public sector entomologists, extension specialist, specialty crop growers, or commodity group representatives to expand registrations for the insecticide flubendiamide on specialty crops/minor uses. Flubendiaminde has been a priority for IR-4 because our stakeholders indicate that it is a very important IPM tool that act specifically on lepidoptera (worms) pest, while not impacting beneficial

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insects such as predatory mites or other beneficial arthropods. As well, this product does not "flare" mites as is often the case with other lepidoptera pesticides.

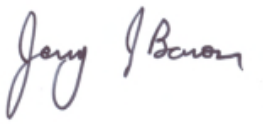
Many of the requests that IR-4 has were to convert existing tolerances on individual crops into crop group tolerances that would extend use of the powerful lepidoptera material to the very minor specialty crops. Specifically, IR-4 received requests to convert existing tolerance into revised crop group tolerances for 08-10 Fruiting Vegetables Group, 11-10 Pome Fruit Group, 12-12 Stone Fruit Group, 14-12-Tree Nut Group, and 20B Sunflower Subgroup. Many of the member crops of these crop groups have limited effective alternative insecticides.

In 2010. IR-4 conducted research, in cooperation with Ag and Ag food Canada, to support an application of BELT SC use in Blueberry to manage cranberry and cherry fruit worms, where there is essentially a zero tolerance for the worms in blueberry fruit market. Entire batches of blueberries are rejected if worms are found. The request came from stakeholders PA and MI stakeholders. The cost of this research was valued at over $300,000 and split by both the US and Canadian government as part of joint research under NAFTA Technical Working Group.

More recently, IR-4 was asked by public sector stakeholders in California, Oregon and Utah to develop new data to reduce the existing registration of BELT SC Insecticide from 8 days to 1 day on the Brassica Leafy Vegetable Crop Group (cabbage, broccoli, and mustard greens), and strawberry. The requestors wrote that this product is a "Very Good IPM Fit; Is safe to predatory mites and other beneficial arthropods when used as directed". These proposed uses were reviewed at the IR-4 Food Use Workshop by nearly 200 participants and were considered the highest priority and therefore, were scheduled for active research in 2016. Less than 20% of the potential projects are given this ranking and because of this ranking, IR-4 was willing to invest over $1.2 million of our limited direct funding and in-kind resources to conduct this research. Participants/stakeholders are very serious about assigning priorities and receiving this highest rating is no trivial matter. IR-4 had already initiated the studies, when the January announcement was made and subsequently suspended research at this time.

We ask and strongly encourage that EPA consider the benefits of flubendiamide on specialty crops when making further decisions.

Sincerely yours,



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The IR-4 Project

Xc: Jim Jones
Dana Sargent

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