



March 4, 2021

Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Cranberry industry comments on the EPA's Pesticide Registration Review: Proposed Interim Decision for Chlorpyrifos

Docket ID: EPA-HQ-OPP-2008-0850

The Cranberry Industry, along with the major cranberry grower associations in the United States, is providing comments on EPA's "Pesticide Registration Review: Proposed Interim Decision for Chlorpyrifos." We are writing to urge EPA to continue to allow the use of chlorpyrifos on cranberry. The Cranberry Institute (CI) is a not-for-profit organization founded in 1951 to further the success of cranberry growers and the industry in the Americas through health, agricultural and environmental stewardship research as well as cranberry promotion and education. Our supporting members handle approximately 80% of the commercial cranberry crop grown in North America.

Chlorpyrifos is a key insecticide for all US cranberry growing areas, but is of special importance to Wisconsin and New Jersey. Wisconsin is the worldwide leader in cranberry production, providing over 55% of the US crop annually. New Jersey has the third highest cranberry production in the country.

Chlorpyrifos is needed for early season pest management, and plays an important role in managing disease as well as insects. Cranberry false blossom disease is caused by a phytoplasma that is transmitted by the blunt-nosed leafhopper as they feed on cranberry. Infected vines will not produce fruit, and will eventually die from the disease. There is no treatment or cure, and infected plants must be removed and destroyed to prevent the spread of infection. The only known tactic for managing the disease is to control the leafhopper insect that vectors the disease. Chlorpyrifos is the primary control option to manage blunt-nosed leafhoppers in WI and NJ. Elimination of chlorpyrifos will leave these growers without effective options and thus increase leafhopper populations. If unmanaged, growers will likely see declines in productivity as was observed in the 1940s-1950s when false blossom nearly eliminated the industry in New Jersey.

The cranberry growers are strong adopters of Integrated Pest Management (IPM). The vast majority of growers make pesticide application decisions based on scouting and other IPM tenets, only spraying for pests that pose an actual threat to the crop. In addition to restrictions imposed by the chlorpyrifos product labels, additional restrictions are in place due to fruit handler demands which result in reduced use and risk for fruit residues and impacts to surface water (e.g. limiting the number and timing of application). The judicious use of chlorpyrifos by growers makes it an effective and important tool for early season pest control.

New Jersey growers practice IPM and only treat for blunt-nosed leafhoppers (based on scouting) in areas of high population, incidence of false blossom, and/or in new varieties. For Wisconsin growers,

chlorpyrifos is a particularly valuable tool in cranberry because it is so effective as a pre-bloom broad-spectrum insecticide that it does not have to be used every year to deliver a strong benefit. Many farms in Wisconsin only apply chlorpyrifos once in a 2–3-year cycle because the high efficacy will reduce the pest pressure enough to use less toxic, non-broad spectrum materials before bloom in the years between chlorpyrifos applications. The Wisconsin farms that reported a resurgence of blunt-nosed leafhopper in 2020 all had one thing in common: they had not used chlorpyrifos in 5-6 years.

	3-yr average of acreage that used chlorpyrifos (2018- 2020)	Acreage with chlorpyrifos use at least once in the last four years (2017 - 2020)
NJ	9.7%	33.3%
MA	1.1%	3.7%
WI	31.3%	71.5%
WA	20.8%	30.1%
OR	0.9%	3.9%
Total US	18%	41%

Table 1. Chlorpyrifos use on US cranberry acreage by state. Comparison between 3-year average and acres that used at least once in four years. Trends demonstrate that although overall usage is relatively low, a large percentage of acres rely on periodic applications.

No real alternatives. Other registered insecticides have limitations for early season use when leafhopper must be controlled, and are not considered an equivalent alternative to chlorpyrifos. Diazinon cannot be applied by air, the primary method of insecticide application in NJ. Applying Sevin pre-bloom has potential negative effects on pollinators and yield. Neonicotinoids (Actara and Assail) have also negative effects on pollinators and they are not recommended to be used pre-bloom. The industry is actively screening and evaluating many other compounds for leafhopper control, but no effective alternatives have been yet identified. In the event an alternative can be found, it will likely take at least several years until growers have access to a new tool.

Cranberry Institute
265 South Meadow Road
Plymouth, MA 02360
Direct Line: (508) 866-1118
www.cranberryinstitute.org
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We request that chlorpyrifos continue to be registered for use on cranberry. It is a critical tool for managing the leafhopper/ cranberry false blossom disease complex. A loss of this compound would be very serious, and it would impact significantly cranberry yields.

We appreciate the opportunity to comment on the Proposed Interim Decision for Chlorpyrifos. Please let us know if you have any further questions.

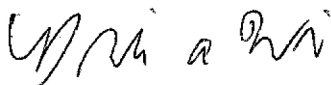
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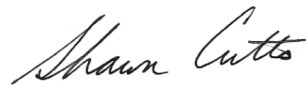
William "Bill" Frantz, Executive Director
Cranberry Institute



Tom Lochner, Executive Director
Wisconsin State Cranberry Growers Association



Brian Wick, Executive Director
Cape Cod Cranberry Growers' Association



Shawn Cutts, President
American Cranberry Growers Association