



**US Environmental Protection Agency
Office of Pesticide Programs**

**Petition for Etoxazole -
Tab C - Additional Letters of Support**

August 11 , 2010

Tab C
Additional Letters of Support

201005751



**U.S. Hop Industry
Plant Protection Committee**

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A subcommittee of:
Washington Hop Commission • Oregon Hop Commission
Idaho Hop Commission • Hop Growers of America

December 14, 2009

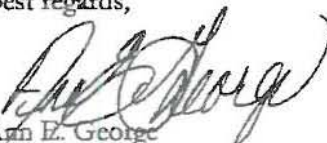
Document Processing Desk
Registration Division
U.S. Environmental Protection Agency

On behalf of the U.S. hop industry, I would like to support the petition for the exclusive use of the active ingredient Etoxazole (Zeal Miticide) from Valent USA based on the following:

- Etoxazole is a mite growth regulator that targets only arthropods in the order Acarina that enables growers to target mite pests with minimal affect on important predator species.
- IPM benefits such as the unique mode of action (IRAC- group 10B), which allows rotation of chemistries as a resistance management tool.
- Long residual activity, which requires fewer applications of miticides.
- Etoxazole use in hop production provides excellent control of two-spotted mite, a pest that must be controlled on an annual basis, or will result in a decrease in yield and quality.

We appreciate this opportunity to submit comments.

Best regards,


Ann E. George
Administrator

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As a Mid Columbia pear and apple grower and researcher, I would like to support the petition for the exclusive use of the active ingredient Etoxazole (Zeal Miticide) from Valent USA based on the following:

- Etoxazole is a mite growth regulator that targets only arthropods in the order Acarina that enables growers to target mite pests with minimal affect on predators and other non-target insects.
- IPM benefits such as the unique mode of action (IRAC- group 10B) which allows rotation of chemistries as a resistance management tool.
- Long residual activity, which requires fewer applications of miticides
- Etoxazole use in pear and apple provides excellent control of two-spotted and European red mites, which can reduce yield and quality.

Regards,



Vernon Fischer Jr.
President
Columbia Ag Research, Inc.

201005750



Washington State University Prosser
Irrigated Agriculture Research and Extension Center

December 11, 2009

To: Document Processing Desk
Registration Division
US Environmental Protection Agency

From: Douglas B. Walsh, Ph.D.
Professor of Entomology
Coordinator, Integrated Pest Management
State Liaison Representative, USDA IR-4 Project
Commissioner, Washington State Commission on Pesticide Registration

Re: Exclusive use of etoxazole (Zeal™) from Valent USA

To whom it may concern,

I am the Entomology Extension Specialist and research lead for specialty crops produced in the inland Pacific Northwest including hops, juice and wine grapes, mint, alfalfa produced for seed, vegetables produced for seed, and peaches. Zeal has recently been registered on grapes, hops, mint, and in alfalfa and vegetable seed production. My research has directly supported the registration of Zeal in these five cropping systems and the registration of Zeal has definitely improved the Integrated Pest Management programs of these respective crops. In hops and mint spider mites, predominantly the two-spotted spider mite and secondarily the Willamette spider mite are the key direct arthropod pests. Spider mite feeding in mint directly reduces mint oil yields and impacts the key flavor components in peppermint. In hops, spider mite feeding indirectly impacts yield by reducing cone size when they are feeding on leaves. However, mites are also a direct pest when they feed on the cones. Feeding directly on the cones reduces cone color (green to grey) and quality. I am currently funded by the hop industry and a USDA Specialty Crop Research Initiative project that is investigating the impact of mite feeding on the key flavor components of hops that are important to brewers including alpha and beta acids.

In alfalfa seed and vegetable seed production spider mite populations will typically outbreak during the bloom period after fields are treated prior to bloom with ecologically disruptive but effective pyrethroid and organophosphate insecticides for Lygus bug control. Pollinator safety to pesticides applied during bloom is extremely important in alfalfa seed production. In pesticide exposure studies I have conducted with both leafcutting and alkali bees Zeal has been the safest miticide I have ever tested. Zeal is a perfect fit for mite control during bloom in alfalfa produced for seed and vegetable seed production.

Spider mites as a pest have diminished as a concern substantially over the past several years in Washington State wine grape vineyards. However we have experienced an increase of leafhopper outbreaks over the past 2 years and unfortunately if this trend continues the insecticides applied for leafhoppers may contribute to future spider mite outbreaks in vineyards. Zeal is tops among the

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miticides I recommend in Washington State University's annual vineyard spray guide extension bulletin for wine grapes.

At the request of both the hop and mint industries I conduct laboratory studies with a precision Potter spray tower on the exposure to candidate pesticides on *Galendromus occidentalis*. *G. occidentalis* is the key predatory mite involved in bioregulating spider mite populations in many crops including hops, mint, and grapes in the Pacific Northwest. Topical exposure of adult *G. occidentalis* has no impact on survivorship and eggs laid subsequent to exposure are viable and result in healthy offspring.

Zeal provides these positive contributions to all of these respective crops IPM programs specifically because it is an insect growth regulator and selectively targets pest mites in the Acarina. Zeal now offers our specialty crop producers a unique mode of action (IRAC 10B) and fits ideally into a miticide resistance management program. This is especially important in hops where miticide resistance is always an issue. In my miticide efficacy studies Zeal when applied according to label specifications provides consistent residual control of spider mites. Please be informed that I support Valent USA's request for the exclusive use of the active ingredient etoxazole. It has been my experience that Valent USA has been a good steward of the crop protection chemistries they bring to market. They maintain qualified technical representatives that are honest in regards to the performance of their products and they have consistently supported the use of Valent products on specialty crops of minor and on occasion miniscule acreage on which the company is likely losing money to maintain the registration.

If I can be of further assistance or if you have a specific request to back up the statements I have made in this support letter for Valent USA, please do not hesitate to ask.

Respectfully,

A handwritten signature in black ink, appearing to read "Douglas B. Walsh". The signature is fluid and cursive, with a large initial "D" and "W".

Douglas B. Walsh, Ph.D.