



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

Petition for Chlorantraniliprole

January 5, 2011



DuPont Crop Protection
Stine-Haskell Research Center
P.O. Box 30
Newark, DE 19714-0030

January 5, 2011

DELIVERED BY COURIER SERVICE

Ms. Venus Eagle (PM 1)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Attention: Minor Use - Exclusive Use Request for Products Containing
Chlorantraniliprole

Dear Ms. Eagle:

DuPont herein submits an application for extension of the exclusive use period for products containing chlorantraniliprole under FIFRA (C)(1)(F)(ii).

On January 29, 2007, DuPont submitted the initial applications for registration of products containing the active ingredient chlorantraniliprole (EPA Reg. Nos. 352-728, 352-729 & 352-730) and a petition for the establishment of tolerances for chlorantraniliprole in food and feed commodities (PP #7F7181). Concurrently, DuPont requested the extension of the exclusive use for a period of 3 years.

Subsequently, we learned from Pat Cimino, EPA-OPP Specialty Crop Advisor, that the Agency was not able to grant our exclusive use request because such requests must first await the issuance of tolerances and registrations; there was no ability to concurrently consider the extension at the same time the Agency was considering the issuances of registrations and tolerances. Ms. Cimino recommended that we submit a new request for reconsideration.

FIFRA (C)(1)(F)(ii) requires the Agency to extend the period of exclusive use for data supporting pesticide products 1 additional year for each 3 minor uses registered within 7 years of the commencement of the exclusive use period, up to a total of 3 additional years for all minor uses registered by the Administrator. The extension is required if the Administrator "determines that, based on information provided by an applicant for registration... that... (II) the alternatives to the minor use pesticide pose greater risks to the environment or human health; (III) the minor use pesticide plays or

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will play a significant part in managing pest resistance; or (IV) the minor use pesticide plays or will play a significant part in an integrated pest management program.”

In the original applications for registrations and petition, DuPont submitted information that clearly establishes that chlorantraniliprole is considerably less toxic to humans than many alternative insecticides. In fact, chlorantraniliprole is remarkable in its low toxicity to humans and other mammals, birds, fish and many other non-target species. A summary of the toxicology results for chlorantraniliprole can be found in the ANNEX IIA: SECTION 3: MAMMALIAN TOXICOLOGY (TIER II - DOCUMENT M-II), DuPont Report No. DuPont-18271 (MRID 46979810). A comparison of the toxicology of chlorantraniliprole with other competitive compounds can be found in the document entitled “Reduced Risk Rationale for Use of DPX-E2Y45 on Apples, Lettuce, Peaches, Pears, Tomatoes and Turf” (DuPont Report Number DuPont-20218, MRID 46980001).

Additionally, due to its mode of action chlorantraniliprole will play an important role in managing pest resistance. The availability of many different products with differing modes of action is of vital importance to extending the usefulness of insect resistance management programs. Lack of cross resistance makes chlorantraniliprole an ideal tool for controlling pyrethroid-resistant, organophosphate-resistant and carbamate-resistant lepidopteran pests. The chlorantraniliprole product labels specify that no more than two consecutive (successive) applications can be made to a given pest species. Then, chlorantraniliprole must be rotated with an effective product having a different mode of action. The labels also recommend limiting the number of applications to two for a particular pest insect within any 30 day period.

Also, chlorantraniliprole may be used as part of an IPM program, which can include biological, cultural, and genetic practices, aimed at preventing economic pest damage. IPM principles and practices include field scouting or other detection methods, correct target pest identification, population monitoring, rotation of insecticides with different modes-of-action, and treating when target pest populations reach locally determined action thresholds.

Chlorantraniliprole will help broaden and strengthen the use of integrated pest management (IPM) strategies. It is fully compatible with use in IPM programs. Chlorantraniliprole is complementary to other lower-risk products, such as Bt, spinosad, indoxacarb, and certain insect growth regulators such as methoxyfenozide and tebufenozide, all of which fit well with IPM programs. Chlorantraniliprole can be used in programs that include both foliar-applied Bt and Bt-modified crops. It complements the spectrum of Bt by controlling difficult insect pests like beet armyworm and fall armyworm. When integrated into field programs, it will help preserve most beneficial species, including parasites and predators, which play an important role in IPM.

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DuPont has submitted residue data for the following minor crops for which the Agency has subsequently issued crop residue tolerances (40 CFR 158.628:

1. Pear (MRIDs 46889203, 47231212, 47138404)
2. Peach (MRIDs 46979509, 46979335, 46979933, 46979932, 47231209)
3. Plum (MRIDs 46979735, 46979510)
4. Sweet Cherry (MRID 46979510)
5. Sour Cherry (MRID 46979510)
6. Broccoli (MRID 46979511)
7. Cauliflower (MRID 46979511)
8. Mustard Greens (MRIDs 47309804, 46979511)
9. Cabbage (MRIDs 46979511, 46979736)
10. Cucumber (MRIDs 47138410, 47231218, 46889201)
11. Summer Squash (MRID 46889201)
12. Cantaloupe/Muskmelon (MRID 46889201)
13. Bell Pepper (MRIDs 47138411, 47231213, 47231214, 46979514, 46889202)
14. Non-Bell Pepper (MRID 47231217, 47231221, 46979514, 46889202, 46979523)
15. Head Lettuce (MRID 46889132, 46979512, 46979937, 47231210, 48170801)
16. Leaf Lettuce (MRID 46889132, 46979512, 46979937, 47231210, 47231220, 47309805, 48170801)
17. Celery (MRID 46889132, 46979937, 48170801)
18. Spinach (MRID 46889132, 46979937, 48170801)

The current DuPont product labels contain these crops, along with several major crops. As such, DuPont is hereby requesting that the Administrator approve an extension of the exclusive use period for an additional 3 years.

Please call me at 302/451-4517 if you have any questions.

Sincerely,



Richard A. Carver, Ph.D.
Sr. Product Registration Manager

cc: Nicole Williams, Registration Division

Robert Perlis, Esq., Office of General Counsel

Pat Cimino, Specialty Crops Advisor