



June 30, 2009

Richard P. Keigwin, Jr.,  
Director, Special Review and Reregistration Division  
Office of Pesticide Programs  
Environmental Protection Agency  
Washington DC, 20460-0001

Re: EPA Impact Assessments on Endosulfan; Request for Comments and Additional Information on Importance of Use  
Docket ID number - EPA-HQ-OPP-2002-0262 (Filed electronically and via letter)

The U.S. Apple Association (USApple) is the national trade association representing all segments of the apple industry. Members include 36 state apple associations representing 7,500 apple growers throughout the country, as well as over 300 individual firms involved in the apple business. USApple appreciates this opportunity to comment on the need for the continued ability for producers to use endosulfan in apple production.

Apple growers use endosulfan to control aphids and other sucking insects that attack apple trees. This use is needed to avoid insect damage that reduces tree vigor, productivity and apple size, which lowers grower revenue and profitability and diminishes the industry's international competitiveness.

The assessment document on endosulfan use on apples prepared by EPA's Biologic and Economic Analysis Division (BEAD) notes that alternatives to endosulfan are available to control some aphid species<sup>1</sup>. However, because of its superior efficacy on the Woolly Apple Aphid, endosulfan has become a primary tool to control outbreaks in some apple producing states. Among the alternative insecticides examined in the BEAD assessment, diazinon is cited as the second most used insecticide for treating Woolly Apple Aphid infestations. However, diazinon is also under registration review<sup>2</sup> and its availability to apple producers is uncertain. Additional insecticides reviewed in the assessment document generally provide less satisfactory control and are significantly more expensive than endosulfan.

The two strategies examined in the assessment of potential risk management strategies are elimination of aerial spraying and the extension of the restricted entry interval (REI) from the current 2 days for the EC formulation and 4 days for the WP formulation to 19 and 26 days

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<sup>1</sup> Assessment of the Impacts of Extending the Restricted Entry Intervals for the Use of Endosulfan on Apples (DP 358333) Office of Prevention, Pesticides and Toxic Substances, EPA, April 17, 2009.

<sup>2</sup> Op Cit

respectively. Since aerial application of endosulfan is extremely rare, we do not disagree with the BEAD assessment that it is likely to have little impact on apple production.

The second of the two strategies for which the agency is seeking comment is the proposal to expand the REI to 19 and 26 days respectively from the current label requirements of 2 and 4 days for the EC and WP formulations respectively. A change of that magnitude in the REI will have a significant impact on the alternatives available to apple growers in treating Woolly Apple Aphid infestations. In many cases, the greatly expanded REI will force growers to use an alternative compound, which the BEAD assessment notes will result in increased cost and in most cases, lower efficacy. In addition to reducing the number of tools available to apple growers, the increased use of the alternative compounds is likely to put increased pressure on pest populations to develop resistance to the remaining pesticides. That situation further exacerbates the financial and operational problems arising from restrictions that have the effect of excluding endosulfan from use on apples.

As EPA moves forward with its reregistration process, USApple requests that the agency consider the cumulative impact of additional crop protection tool restrictions on apple production. As the agency restricts the use of the remaining crop protection tools, growers are left with fewer options to control key apple pests. These restrictions are forcing growers to rely on fewer materials, setting the stage for increased insect resistance. Additionally, most of the newer alternatives are significantly more expensive. Pests which were once considered secondary concerns may now become more difficult to control as broad-spectrum uses are either canceled or restricted. The greatly expanded REIs proposed for endosulfan on apple production will likely greatly reduce, or eliminate endosulfan from its primary use on apples as an effective treatment for the Woolly Apple Aphid. Therefore, we respectfully request that the REI for the use of endosulfan on apples be retained at the currently labeled 2 days for the EC formulation and 4 days for the wettable powder formulation.

Please contact me by telephone at (703) 442-8850 or via e-mail at [mseetin@usapple.org](mailto:mseetin@usapple.org) should you have any questions or require additional information.

Sincerely yours,



Mark W. Seetin  
Director, Regulatory and Industry Affairs

cc: USApple Board of Directors