



ADVISORY

CALIFORNIA DEPARTMENT OF PESTICIDE REGULATION IMIDACLOPRID REEVALUATION

APRIL 16, 2009

The California Citrus Quality Council (CCQC) is sending this advisory to inform members of the California citrus industry that the California Department of Pesticide Regulation (CDPR) has initiated a reevaluation of four pesticides within the nitroguanidine chemical class of neonicotinoids, including imidacloprid, thiamethoxam, clothianidin and dinotefuran.

The reevaluation is being conducted as a result of a FIFRA 6(a)(2) report submitted to CDPR by Bayer CropScience after noticing elevated levels of imidacloprid in several types of ornamental plants after imidacloprid applications. Registrants are required to notify the appropriate regulatory agencies if they discover information about a chemical that could change its risk profile. CDPR has initiated the reevaluation to determine whether bees may be at risk from the elevated levels of residues in nectar and other plant parts.

CDPR is holding meetings with Bayer CropScience and approximately 40 other imidacloprid registrants to best identify what studies need to be conducted to provide relevant information for the reevaluation. Bayer CropScience is working with CDPR to identify existing data and new studies needed for CDPR to conduct its reevaluation. Bayer CropScience will submit new study proposals to CDPR to answer questions generated by the review. A time line for conducting and reporting study results has not been established yet, but the process may take up to two years. While Bayer CropScience is not the only imidacloprid registrant, it is the primary research data owner.

On a separate regulatory front, the U.S. Environmental Protection Agency (EPA) recently initiated its registration review of imidacloprid as required by the Food Quality Protection Act. EPA will subject imidacloprid, and all other chemicals undergoing registration review, to an Endangered Species Act review and look for changes in the use that may change the chemical's dietary, environmental or farm worker risk profile. EPA is expected to monitor California's reevaluation of imidacloprid and factor the results into its registration review.

Attached for your information are comments CCQC submitted to EPA in support of imidacloprid's registration review. CCQC also sent these comments to CDPR for consideration under its reevaluation of imidacloprid.

It is unknown at this time whether these reviews will affect the use of imidacloprid on citrus.

CCQC plans to monitor development of these reviews and coordinate with Bayer CropScience and citrus industry allies to preserve the safe use of imidacloprid for the California citrus industry.

Please contact me by telephone at (530) 885-1894 or via e-mail at jcranney@calcitrusquality.org if you have questions or need additional information.



March 14, 2009

Mr. Rick P. Keigwin, Jr.
Director, Special Review and Registration Division
Office of Pesticide Program
Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460-0001

Re: Pesticide Registration Review; New Dockets Opened for Review and Comment;
Imidacloprid; Docket No. EPA-HQ-OPP-2008-0844

Dear Mr. Keigwin,

The California Citrus Quality Council (CCQC) represents the California citrus industry on technical and regulatory issues domestically and overseas. CCQC appreciates this opportunity to comment on the importance of imidacloprid in California citrus production.

The most important use of imidacloprid is to control insect vectors that transmit devastating diseases to citrus trees and grapevines. Imidacloprid is used in areawide treatment programs to control aphids that transmit citrus tristeza virus (CTV) to citrus; the glassy-winged sharpshooter which over winters in citrus, but transmits Pierce's disease to grapevines; and the Asian citrus psyllid which transmits the deadly huanglongbing (HLB) disease to citrus trees. Each of these exotic diseases has the potential to cause unsustainable crop losses or cause the industry to cease commercial production if the disease is allowed to spread.

CTV is known world-wide as one of the most destructive virus diseases of citrus. Trees infected with severe strains of CTV become stunted, lose their leaves and slowly decline. Fruit produced from these trees is usually small and of poor quality. Novel therapies are being developed to help growers cope with the disease once it is established, but these treatments are fraught with complications that can make production economically unsustainable. The current strategy to control CTV is to reduce vectoring aphids which spread the disease and remove trees infected with destructive strains of the virus.

Pierce's disease is spread among grapevines by the glassy-winged sharpshooter. Once a vine is infected it declines over a period up to five years and eventually dies. Widespread infection can make continued production unsustainable, and if left unchecked, it could lead to the elimination of the California wine and table grape industries. Glassy-winged sharpshooter uses citrus as an

overwintering host. Pierce's disease has been suppressed by reducing the sharpshooter populations during fall or spring in citrus and during the spring and summer in the grapes. The citrus industry has partnered with the grape industry to help manage this insect as a participant in the California Department of Food and Agriculture's (CDFA) Pierce's Disease Control Program. Without this control, sharpshooter populations would increase and continue to threaten the viability of the California wine and table grape industries.

The Asian citrus psyllid (ACP) is the insect vector that spreads HLB, the most deadly bacterial disease of citrus in the United States. Once trees are infected there is no cure. Trees decline over a period of two to four years, producing bitter fruit that is unmarketable. This insect, which was recently introduced in the United States, reproduces rapidly and is exceptionally mobile. Since there is no cure for HLB infected trees, growers must eliminate ACP and remove infected trees to stop the spread of HLB.

ACP was recently discovered in urban neighborhoods in San Diego, California and in parts of Imperial and Riverside counties. HLB has not been found in California yet, but it is found in Florida and Cuba and is likely to arrive in California via infected psyllids from Mexico. CDFA has successfully slowed the statewide spread of ACP by deploying an areawide ACP control strategy that relies heavily on imidacloprid applications. Imidacloprid reliably controls adults and nymphs and is effective for up to three months after application. This long term efficacy is a critically important benefit, because homeowners tend to oppose frequent pesticide applications. Additionally, no viable and effective alternative systemic insecticides are currently available for residential applications on citrus. Imidacloprid is expected to become even more important if ACP spreads to commercial citrus groves, since it would be one of the primary insecticides used to control ACP.

Imidacloprid is typically applied as a drench treatment or with drip irrigation. Citrus trees absorb the chemical which is systemically spread through the tree to vulnerable sites where insects feed. Systemic insecticides are preferred because they are more compatible with integrated pest management programs than many foliar insecticides. Imidacloprid is especially effective against sucking insect pests such as whiteflies, aphids, psyllids, sharpshooters, which tend to be vectors of plant diseases. Thus, it is an especially important tool for invasive pests and diseases. Globalization has resulted in more international movement of people and plants, so the threat from invasive pests is expected to increase significantly in the future. Imidacloprid is also an important replacement tool for organophosphate and carbamate insecticides in commercial citrus, especially for citricola scale and citrus leafminer.

Imidacloprid is the preferred treatment for aphids, glassy-winged sharpshooter and ACP, because of its efficacy, reasonable cost, long term efficacy and ease of application. Without this critical tool, California's citrus growers could lose significant acreage to CTV and potentially lose the vast majority of its commercial acreage to HLB. Additionally, California's wine and table grape industries could be decimated by the spread of Pierce's disease.

CCQC appreciates this opportunity to comment on the need for imidacloprid and we look forward to working with your agency to provide additional information, if needed to complete a successful review of this vital compound.

Please contact me by telephone at (503) 885-1894 or via e-mail at jcranney@calcitrusquality.org if you have any questions or need additional information.

Sincerely yours,

A handwritten signature in black ink that reads "JRCranney Jr". The letters are cursive and somewhat stylized.

James R. Cranney, Jr.
President

cc: CCQC Board of Directors