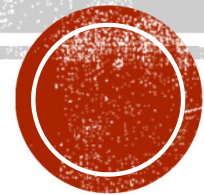


**EPA REVIEW STATUS OF METRIBUZIN &
OTHER CHEMISTRIES; IR4 PROGRAM AND
SUGARCANE**



FIRST NOTIFICATION METRIBUZIN EPA REGISTRATION REVIEW



630 Freedom Business Center
Suite 402
King of Prussia, PA 19406

August 12, 2019

To Whom It May Concern:

Herbicides are essential to prevent weed competition and losses in sugarcane production. Sugarcane is most susceptible to weed competition during the first 8 to 10 weeks after cane emergence. Tricor Herbicide (UPL NA INC.'s metribuzin brand) is an important part of the recommended management program to protect sugarcane acres. Currently, metribuzin is under registration review with the US Environmental Protection Agency (EPA). After receiving draft human dietary risk assessments, the EPA stated that the drinking water assessments fall above acceptable levels and that the highest estimated drinking water concentration (EDWCs) come from sugarcane. The basic registrant, Bayer Crop Science has proposed a maximum use rate of 1 lb per acre per year for all crops. Currently, the maximum commercial labeled rates for Tricor DF (EPA Registration No. 70506-103) on sugarcane are as follows:

State	Maximum Use Rate (lb per acre)	Application Type
Florida	2 – 2/3	Ground
Louisiana, Texas	4	Broadcast

We understand that growers in your state often use more than 1 lb per acre for best efficacy results. Please consider voicing your support of existing labeled use rates by writing a letter describing current use patterns on sugarcane and the importance of metribuzin in the herbicide management program.

Please do not hesitate to reach out with questions. Thank you for your involvement.

A handwritten signature in black ink, appearing to read "MP", enclosed in a rectangular box.

Martin Poveda
U.S. Marketing Manager
martin.poveda@upl-ltd.com

Alexis B. Bromley

Alexis Benge Bromley
Regional Regulatory Manager
alexis.benze@upl-ltd.com

Matt Manupella
 U.S. EPA Headquarters
 William Jefferson Clinton Building
 1200 Pennsylvania Avenue, N.W.
 Washington, DC 20460

September 12 2019

Dear Mr. Manupella:

I am Dr. Kenneth Gravois, sugarcane specialist with the Louisiana State University Agricultural Center in Baton Rouge, Louisiana. I wish to provide Louisiana sugarcane use data for the current registration review for metribuzin herbicide – thank you for allowing the opportunity.

Pesticide reviews are important and necessary for sustainable use of important herbicides, insecticides, and fungicides for the Louisiana sugarcane industry. Our group, on behalf of the Louisiana sugarcane industry, has participated many times in the registration review process by making available important use data and other comments where important. The USDA Office of Pest Management Policy has kept us informed when registration reviews occur for important pesticides for Louisiana.

This was the situation for the registration review of metribuzin. We supplied rate and use information for Louisiana sugarcane producers through the Office of Pest Management Policy in November of 2017. In August of 2019, two agriculture chemical dealers informed us of a possible metribuzin rate reduction to 1 pound/acre proposed by Bayer CropScience. The discussion was prompted by an EPA Tier II Drinking Water Assessment as part of the registration review for metribuzin.

In the risk assessment, EPA scientists used a Florida citrus ground water (sand soil) scenario and a Louisiana sugarcane model. The citrus model is not representative for either Florida or Louisiana sugarcane production. Metribuzin is only labeled for muck soils in Florida. For the Louisiana model, the most common coarse textured soil types for sugarcane are *Commerce silt loam*, *Cancienne silt loam*, or *Patouville silt loam*. The model also used an annual broadcast application rate of 8 lbs. a.i./acre. This rate was derived from the metribuzin label for sugarcane grown in Hawaii. As of 2016, sugarcane is no longer grown in Hawaii; any label update should reflect this change. Louisiana sugarcane producers do not apply metribuzin at that high of a rate. Maximum annual in-crop metribuzin use is 2.625 lbs. a.i./acre; maximum annual planting-year rate is 2.25 lbs. a.i./acre. The table below is reflective of Louisiana application timing, rates, and percentage of metribuzin use.

Metribuzin Use for Sugarcane in Louisiana				
Application Timing	Rate	% Acres Treated	Number of Applications	Comments
Spring	1.125 lbs. a.i./acre	80 %	1/year	72-inch row; applications are banded on 36-inch row top; in-crop application
Early-summer (Lavbv)	1.50 lbs. a.i./acre	65 %	1/year	72-inch row; applications are banded on 48-inch row middle; in-crop application
After Planting	2.25 lbs. a.i./acre	90 %	Once every 5 years	Applied broadcast across the entire 72-inch row; 20% of the farm is in fallow and replanted each year – non-crop application)

The Louisiana sugarcane industry has a long history of safe metribuzin use. The Louisiana Department of Agriculture and Forestry (LDAF) routinely samples surface water each quarter of the year. We have LDAF data from 2014 - 2018. LDAF provided data only where metribuzin was detected; there were sample sites where no metribuzin was detected. We can provide the entire data set if that would be helpful. Averages and ranges are provided in the table below.

Louisiana routine surface water samples with metribuzin detections (2014 – 2018).

Year	Average Metribuzin Level (ppb)	Range Metribuzin Level (ppb)
2014	1.76	0.20 – 7.84
2015	1.03	0.20 – 6.84
2016	1.43	0.20 – 6.00
2017	1.45	0.22 – 8.80
2018	1.09	0.20 – 11.00
5-year average	1.35	

Bayer CropScience provided an analysis examining metribuzin levels in groundwater based on U.S. Geological Survey data. Their assessment showed metribuzin levels much lower than simulated values determined by the EPA analysis. We support the Bayer CropScience request to use monitoring data rather than modeling predictions.

In summary, the EPA model may not accurately reflect metribuzin use in Louisiana sugarcane production. The Florida citrus model represents an off-label application; Louisiana soil types are very different. In addition, the model use rate is not reflective of Louisiana application rates in sugarcane but taken from the metribuzin label for sugarcane in Hawaii, which ceased production in 2016. Metribuzin rates reductions in Louisiana sugarcane would force increased use of atrazine. Our goal is to keep atrazine use at current levels because we recently mitigated an impaired watershed for high concentrations of atrazine. We hope these clarifications prove useful as the metribuzin registration review continues forward.

Metribuzin is a critically important herbicide used by Louisiana sugarcane farmers. We ask that metribuzin label for sugarcane in Louisiana remain as is. Please feel free to contact me (225-281-9472 or kgravois@agcenter.lsu.edu) for any further assistance you may need.

Sincerely,

Kenneth Gravois
 Louisiana State University, Agricultural Center
 Sugarcane Specialist





Implementing Registration Review

EPA will review each registered pesticide at least every 15 years to determine whether it continues to meet the FIFRA standard for registration. Pesticides registered before 1984 have been reevaluated initially under the reregistration program. These pesticides also are subject to registration review.

Registration Review Process Components:

- [Docket opening](#)
- [Focus meetings](#)
- [Case development](#)
- [Registration review decision](#)





Docket Opening

- Facts about the pesticide and its current use and usage.
- Anticipated risk assessment and data needs.
- An estimated timeline for the review.

Focus Meetings

Case Development





Interim Decision

EPA may issue, when appropriate, an interim registration review decision before completing a registration review. The interim decision may, among other things,

- require new or impose interim risk mitigation measures;
- identify data or information needed to complete the review (a DCI may be issued); and
- include schedules for submitting the required data, conducting the new risk assessment, and completing the registration review.





Quarter 2 FY2020 (January - March 2020)

From Ian Murphy, Federal Registrations Manager, Bayer

The proposed Interim Decision has not been posted yet. My understanding is that the EPA is deciding this month whether they will issue this in this quarter, or if they have to delay as they acquire more information/prioritize other review actions.

Note: the proposed ID will give a list of proposed label and use actions/mitigations and allow stakeholders a chance to comment on those and ask for adjustments to the decision

- Acetamiprid
- Boscalid
- Clopyralid
- Coumaphos
- Cyfluthrins
- Cyproconazole
- Deltamethrin
- Esfenvalerate
- Etoxazole
- Fenamidone
- Fenpropathrin
- Flonicamid
- Fluazifop butyl, isomers
- Flumetralin
- Flumioxazin
- MCPB
- Mecoprop
- Methomyl
- Metribuzin
- Permethrin
- Phenothrin
- Prallethrin
- Pinoxaden
- Pyraclostrobin
- Pyraflufen-ethyl
- Tau-Fluvalinate
- Thiodicarb
- Triphenyltin hydroxide (TPTH)



EPA official encourages ag industry feedback

EPA official encourages agriculture to weigh in on regulations.

Ron Smith | Jan 21, 2020



Ron Smith, Auburn University Extension entomologist; Jimmy Hargett, Bells, Tenn., farmer; and Ron Smith, editor, Delta Farm Press, talk about the many Beltwide Cotton Conferences they have attended over the years. The three got together at the 2020 Beltwide in Austin, Texas.



An EPA official challenged the agriculture industry to take advantage of public comment periods to make their cases for retaining products they need to protect crops.

"It is vital that we get comments from you on how a product is used," said Rick Keigwin, director, EPA Pesticide Programs, during the Cotton Consultant's Conference, the lead-in to the annual Beltwide Cotton Conferences, held this year in Austin, Texas, Jan. 8-10.

DS

Spaunhorst, Douglas - ARS <douglas.spaunhorst@usda.gov>

Lee.VanWychen@wssa.net; Orgeron, Albert; Gravois, Kenneth; Herman Waguespack

1 | 8:3

FW: Metribuzin EPA Registration Review Status

You replied to this message on 1/30/2020 1:15 PM.

 Sugarcane Metribuzin Letter for Louisiana.pdf
3 MB

EXTERNAL EMAIL: Do Not Click on links or attachments unless you know the content is safe.

Good morning Lee,

It was nice to catch up with you on Tuesday at the SWSS meeting in Biloxi and I hope you had a safe trip to your next destination.

Attached is a letter from Dr. Kenneth Gravois, LSU AgCenter Sugarcane Specialist, that was sent to Matt Manupella regarding EPA's review of metribuzin. Metribuzin is a foundational herbicide used by LA sugarcane growers because of broad-spectrum small seeded annual grass and broadleaf weed control. Several issues are highlighted in the letter regarding methods EPA scientists used, most notably the use of metribuzin on sand soils – not labeled in Florida, labeled only on Florida muck soils. Second, they used broadcast application rates of 8 lbs/ac which is labeled for sugarcane grown in Hawaii – sugarcane has not been commercially grown in Hawaii since 2016 and does not reflect rates applied in Louisiana. Additional examples are in the attached letter, along with surface water data provided by the Louisiana Department of Agriculture and Forestry .

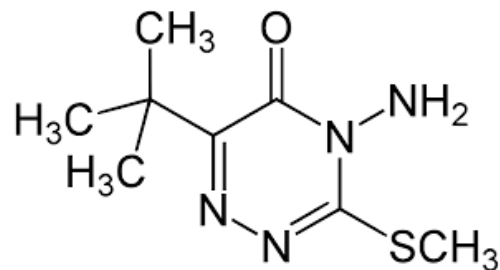
If you have any questions feel free to contact myself, Dr. Albert Orgeron (LSU AgCenter Sugarcane Weed Specialist), or Dr. Kenneth Gravois (LSU AgCenter Sugarcane Specialist).

Thanks,

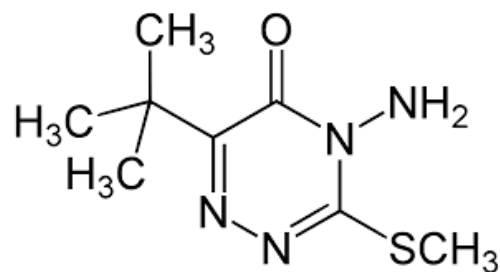
-Doug

Douglas J. Spaunhorst, Ph.D.
Research Agronomist (Weed Science)
USDA,ARS Sugarcane Research Unit
5883 USDA Road
Houma, LA 70360
Cell: 985-209-4040
Fax: 985-868-8369
Email: Douglas.Spaunhorst@usda.gov

USDA OFFICE OF PEST MANAGEMENT POLICY



METRIBUZIN REGISTRATION REVIEW UPDATE



THE IR-4 PROGRAM — TRICLOPYR UPDATE

- Project Mission

The IR-4 Project aids growers by facilitating registrations of pesticides and biopesticides on specialty food crops (fruits, vegetables, nuts, herbs, spices) and environmental horticulture crops (trees, shrubs, flowers).

- Participants

Funding Support



United States Department of Agriculture
National Institute of Food and Agriculture

United States Department of Agriculture
Agricultural Research Service

United States Department of Agriculture
Foreign Agricultural Service

United States Department of Agriculture
Animal and Plant Health Inspection Service



THE IR-4 PROGRAM – TRICLOPYR UPDATE

- Dan Kunkel, Senior Associate Director
- Ken Samoil, Research Coordinator and Study Director for Triclopyr



THE IR-4 PROGRAM – TRICLOPYR UPDATE

- All trials have been conducted and samples collected in Louisiana and Florida.
- No data in Texas; anticipated data collection in September 2020
 - This trial was the large one with samples to be sent to the food grade processing lab in Idaho
- Samples sent to analytical lab for residue testing
- Extend the Section 18



THE IR-4 PROGRAM – TRICLOPYR UPDATE

