



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

**Petition for Etoxazole -  
Tab B - IR 4 Letter of Support**

**August 11 , 2010**

**Tab B**  
**IR-4 Letter of Support**



Providing Safe and Effective Pest  
Management Solutions for  
Specialty Crop Growers

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December 18, 2009

Ms. Lois Rossi  
Director, Registration Division  
Office of Pesticide Programs  
US Environmental Protection Agency  
Washington, DC

Subject: Extension of Exclusive Use Period for Etoxazole

Dear Lois,

The purpose of this letter is to formally state the support of the IR-4 Project in the petition to extend the period of exclusive use of data protection for the important plant mite management product for specialty crops. The IR-4 Project has received 23 specific requests for assistance from growers, commodity groups, state/federal researchers and extension personnel for IR-4 to facilitate the registration of etoxazole on specialty food crops. IR-4 also received numerous requests for assistance to facilitate registration for etoxazole on ornamental crops.

As you know, the IR-4 Project was established in 1963 by the State Agricultural Experiment Stations to provide a mechanism to develop the data required by the regulatory authorities to support the registration on high value, low acreage crops. The IR-4 Project has developed a formalized scheme to prioritize potential pest management solutions to pest management voids on specialty crops. This is a very selective and competitive process and decisions drive the use of limited research funds. During this process, the participants include many factors in selecting projects including "Consideration of priorities should include the availability and efficacy of alternative pest management products, the potential pest damage from the target pest, the performance of the proposed product in managing the target pest and the compatibility of the proposed product in new and existing Integrated Pest Management Programs."

The need for etoxazole on these specialty crops was clearly articulated at IR-4 Food and Ornamental Workshops by specialty crop stakeholders for projects with limited interest by its US registrant, Valent USA. Etoxazole is a newer class of chemistry that is extremely effective to manage many difficult to control mites, including Two-spotted Spider Mites, European Spider Mites, Broad Mites, Citrus Red Mites, Persea Mites, among others. This product is extremely important in rotations with others in resistant management programs. Etoxazole is an+ IRAC Group 10B mite growth inhibitor and has a unique mode of action among mite control products. It is our understanding the etoxazole has been classified by EPA as a reduced risk for several uses.

*Most funding for IR-4 is provided by Special Research Grants and Hatch Act Funds from USDA/CSREES,  
in collaboration with the State Agricultural Experiment Stations and USDA/ARS.*

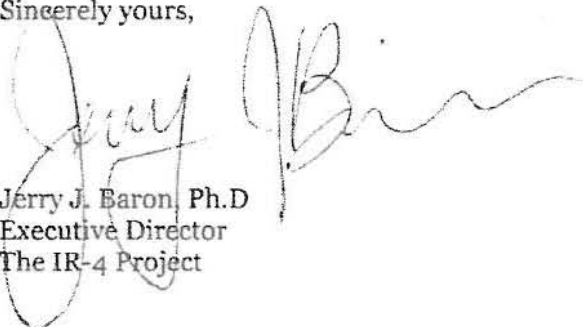


Based on consensus decisions of the participants at annual IR-4 Food Use Workshops, IR-4 has been conducting research with these active ingredients since 2003, and has conducted Magnitude of the Residue Studies which have supported these registrations on Greenhouse tomato, cucumber/melon cucurbit vegetable subgroup, stone fruit crop group, hops, and mint. Though it is not relevant to this application, IR-4 has several other projects in the registration queue that we expect to submit shortly, including peppers (will expand to allow registration on fruiting vegetable crop group), caneberry (will expand to allow registration on berry and small fruit subgroups 13-07 F and 13-07 G), summer squash (will expand to allow registration to the full cucurbit vegetable crop group), avocado, mango and papaya. Additionally, IR-4 is starting new work in 2010 on grasses on manage Grass Bank Mites.

IR-4 appreciates the opportunity to work with products like etoxazole . We are certain that our efforts will provide growers of certain specialty crops with a much needed mite management tool.

Please let me know if you need additional information or if I can answer any additional questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jerry J. Baron". The signature is fluid and cursive, with a large initial "J" and "B".

Jerry J. Baron, Ph.D  
Executive Director  
The IR-4 Project

Cc: J. Smith, Valent