



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

June 24, 2015

Mr. Reuben Baris, PM Team #7
U.S. Environmental Protection Agency
Document Processing Desk
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard, 2777 South Crystal Drive
Arlington, VA 22202 (703) 305-7356

SUBJECT: Additional Information to Support the Request to Extend Exclusive Use of Data as Provided by FIFRA Section 3(C)(1)(F)(ii) DuPont™ Cyazypyr® Technical (352-856) PRIA M007 Submission Dated March 14, 2014

Dear Mr. Baris,

As requested by the Agency, E.I. duPont de Nemours and Company ("DuPont") is herein submitting additional information to support the request to extend the exclusive use of data provided by FIFRA Section 3©(1)(F)(ii) for DuPont Cyazypyr Technical (352-856) dated March 14, 2014.

A Request for Extension of Exclusive Use under FIFRA (C)(1)(F)(ii)

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 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."

On May 21, 2012, the Agency determined that the crops included with the Reduced Risk Petition (MRID No. 48540701) were considered reduced risk, as the mammalian toxicity and ecotoxicity risk profiles of cyantraniliprole were favorable compared to registered alternatives. The use of cyantraniliprole on these crops was approved by the Agency in January, 2014 (EPA Reg. Nos. 352-856, 352-857, 352-859, and 352-860).

Additionally, due to its unique mode of action, cyantraniliprole plays 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 cyantraniliprole an ideal tool for controlling pyrethroid-resistant, organophosphate-resistant and carbamate-resistant lepidopteran pests.

Also, cyantraniliprole 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.

There are at least 249 minor crops registered on the DuPont cyantraniliprole labels for EPA Reg. Nos. 352-857, 352-859, and 352-860. The use of cyantraniliprole on all of the minor crops was determined to be reduced risk by the Agency on May 21, 2012. These minor crops are listed in the table below.

Crop Group Number	Crop Group	Crop(s)	Number of Crops
1C	Tuberous and corm vegetables	Arracacha; arrowroot; artichoke, Chinese; artichoke, Jerusalem; canna, edible; cassava, bitter and sweet; chayote (root); chufa; dasheen (taro); ginger; leren; sweet potato; tanier; turmeric; yam bean; yam, true	16
3-07	Bulb vegetables	Chive, fresh leaves; chive, Chinese, fresh leaves; daylily, bulb; elegans hosta; fritillaria, bulb; fritillaria, leaves; garlic, bulb; garlic, great-headed, bulb; garlic, serpent, bulb; kurrat; lady's leek; leek; leek, wild; lily, bulb; onion, Beltsville bunching; onion, bulb; onion, Chinese, bulb; onion, fresh; onion, green; onion, macrostem; onion, pearl; onion, potato, bulb; onion, tree, tops; onion, Welsh, tops; shallot, bulb; shallot, fresh leaves; cultivars, varieties, and/or hybrids of these	25
4	Leafy vegetables (except Brassicas)	Amaranth (Chinese spinach); arugula (roquette); cardoon; celery; celery, Chinese; celtuce; chervil; chrysanthemum, edible-leaved; chrysanthemum, garland; corn salad; cress, garden; cress, upland; dandelion; dock (sorrel); endive (escarole); fennel, Florence; lettuce, head and leaf; orach; parsley; purslane, garden; purslane, winter; radicchio (red chicory); rhubarb; spinach; spinach, New Zealand; spinach, vine; Swiss chard	27
5	Brassica (cole) leafy vegetables	Broccoli; broccoli, Chinese (gai lon); broccoli raab (rapini); Brussels sprouts; cabbage; cabbage, Chinese (bok choy); cabbage, Chinese (napa); cabbage, Chinese mustard(gai choy); cauliflower; cavalo broccolo; collards; kale; kohlrabi; mizuna; mustard greens; mustard spinach; rape greens	17
8-10	Fruiting vegetables	African eggplant; bush tomato; bell pepper; cocona; currant tomato; eggplant; garden huckleberry; goji berry; groundcherry; martynia; naranjilla; okra; pea eggplant; pepino; nonbell pepper; roselle; scarlet eggplant; sunberry; tomatillo; tree tomato; cultivars, varieties, and/or hybrids of these	20
9	Cucurbit vegetables	Chayote (fruit); Chinese waxgourd (Chinese preserving melon); citron melon; cucumber; gherkin; gourd, edible (includes hyotan, cucuzza, hechima, Chinese okra); Momordica spp (includes balsam apple, balsam pear, bittermelon, Chinese cucumber); muskmelon (includes cantaloupe); pumpkin; squash, summer; squash, winter (includes butternut squash, calabaza, hubbard squash, acorn squash, spaghetti squash); watermelon	12
10-10	Citrus fruit	Australian desert lime; Australian finger-lime; Australian round lime; Brown River finger lime; calamondin; citron; citrus hybrids; grapefruit; Japanese summer grapefruit; kumquat; lemon; lime; Mediterranean mandarin; mount white lime; New Guinea wild lime; pummelo; Russell River lime; satsuma mandarin; sweet lime; tachibana orange; Tahiti lime; tangelo; tangerine (mandarin); tangor; trifoliate orange; uniq fruit; cultivars, varieties, and/or hybrids of these	25
11-10	Pome fruit	Azarole; crabapple; loquat; mayhaw; medlar; pear; pear, Asian; quince; quince, Chinese; quince, Japanese; tejocote; cultivars, varieties, and/or hybrids of these	11
12	Stone fruit	Apricot; cherry, sweet; cherry, tart; nectarine; peach; plum; plum, Chickasaw; plum, Damson; plum, Japanese; plumcot; prune (fresh)	11

Crop Group Number	Crop Group	Crop(s)	Number of Crops
13-07B	Bushberries	Aronia berry; blueberry, highbush; blueberry, lowbush; buffalo currant; Chilean guava; cranberry, highbush; currant, black; currant, red; elderberry; European barberry; gooseberry; honeysuckle, edible; huckleberry; jostaberry; Juneberry (Saskatoon berry); lingonberry; native currant; salal; sea buckthorn; cultivars, varieties, and/or hybrids of these	19
14-12	Tree nuts	African nut-tree; beechnut; Brazil nut; Brazilian pine; bunya; bur oak; butternut; Cajou nut; candlenut; cashew; chestnut; chinquapin; coconut; coquito nut; dika nut; ginkgo; Guiana chestnut; hazelnut (filbert); heartnut; hickory nut; Japanese horse-chestnut; macadamia nut; mongongo nut; monkey-pot; monkey puzzle nut; Okari nut; Pachira nut; peach palm nut; pequi; Pili nut; pine nut; pistachio; Sapucaia nut; tropical almond; walnut, black; walnut, English; yellowhorn; cultivars, varieties, and/or hybrids of these	37
20	Oilseeds	Borage; calendula; castor oil plant; Chinese tallowtree; crambe; cuphea; echium; euphorbia; evening primrose; flax seed; gold of pleasure; hare's ear mustard; jojoba; lesquerella; lunaria; meadowfoam; milkweed; mustard seed; niger seed; oil radish; poppy seed; rose hip; safflower; sesame; stokes aster; sweet rocket; tallowwood; tea oil plant; vernonia; cultivars, varieties, and/or hybrids of these	29
TOTAL			249

Thank you in advance for your time and effort in processing this request. If you have any questions regarding this application for registration please contact me at 302-366-5712 or e-mail at tim.mcpherson@dupont.com.

Sincerely,



Tim McPherson (S300/420)
 Senior Product Registration Manager