Institute of Food and Agricultural Sciences
Citrus Research and Education Center

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May 14, 2021

Re: 24(c) registration for the insecticide Belay Insecticide

To Whom It May Concern:

We are writing this letter in support of Valent's request for a 24(c) registration for the Belay Insecticide for application against Asian citrus psyllid (ACP), *Diaphorina citri,* in Florida citrus. ACP is a major economic pest of citrus worldwide and vector of the pathogen, *Candidatus* Liberibacter asiaticus, that causes huanglongbing (HLB). The disease affects all commercial citrus varieties accounting for $1 billion in annual losses in FL and thousands of lost jobs. In the US, HLB has reduced production of processed and fresh citrus by approximately 21 and 72%, respectively, from 2007-08 to 2017-18.

HLB was first discovered in South Florida in August, 2005 and today over 90% of grove acres and over 80% of trees are infected. The ACP vector was first identified in Florida in 1998. Recommended management practices for HLB include use of disease free stock, inoculum removal by destruction of infected trees, and suppression of ACP. To date, there is no cure for the disease. Other tactics, including shoot tip grafting, thermotherapy, and antibiotics, have shown modest feasibility as possible HLB therapies under greenhouse conditions, but have not been effective under field conditions.

Given the effectiveness of primary and secondary pathogen spread by ACP, chemical control of vector remains a critical component of disease management. Although various vector control strategies have been explored in citrus groves, including cultural, chemical, and biological control, insecticide use has been the most prevalent method employed by growers given the rapid and visible effects on pest mortality. Although management practices for ACP vary among Florida citrus growers, use of foliar and systemic insecticides is the most common tactic for reducing ACP populations. Growers following standard commercial management practices have, until recently, made between 8 and 12 insecticide applications per year, including neonicotinoid. Consequences have emerged following frequent insecticide applications for ACP management, including insecticide resistance and elimination of beneficial species. Recently, it has been demonstrated that rotating insecticide modes of action can effectively prevent and even reverse insecticide resistance among populations of ACP in Florida, if 5 modes of action are rotated annually. Therefore, it is critical for FL citrus growers to have available to them as many different insecticide modes of action, as tools to manage ACP while also doing so in a manner which prevents development of insecticide resistance. In this case, losing access to a tool within the Group 4A, such as Belay, could significantly hamper current efforts to manage HLB. Therefore, we express our full support for extending the registration of this special local needs 24(c) registration for the Belay Insecticide.

Sincerely,

Jawwad Qureshi

Digitally signed by Jawwad Qureshi
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