Minnesota Department of Agriculture

April 6, 2017

Tawanda Maignan, Team Leader
Emergency Response Team
U.S. EPA Office of Pesticide Programs
Document Processing Desk (EMEX)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Dear Ms. Maignan:

In accordance with Section 18 of the Federal Insecticide, Fungicide and Rodenticide Act, and 40 CFR 166.20, the Minnesota Department of Agriculture (MDA) is requesting a Section 18 emergency exemption for the use of sulfoxaflor (formulated as Transform® WG, EPA Reg. No. 62719-625) to manage soybean aphid in soybean in 2017. The University of Minnesota has cited the recent development of resistance to pyrethroid insecticides in soybean aphid as the basis for the pest emergency. The use of sulfoxaflor would aid in resistance management and thereby prevent significant economic loss.

Note that this request is for a single application of sulfoxaflor per crop, rather than four applications per crop as previously authorized under the Section 3 registration. As stated in the application package, the University of Minnesota reports that a "single, well-timed (threshold-based) application of an effective insecticide is generally sufficient to protect soybean yield." As stated in the registrant's letter of support, "For the relatively short-term purposes of this Section 18 application, Dow AgroSciences believes limiting use to a single application would be acceptable, although we believe growers will eventually need the flexibility to make multiple applications for long-term aphid management."

It is our understanding that this is the first requested use of sulfoxaflor on soybean under FIFRA Section 18 following the Agency's decision to not reinstate this use under Section 3 in 2016. Other states requested and received authorization for use of sulfoxaflor on cotton and sorghum in 2016-2017. The MDA would like to reference these applications for any new information that may be relevant for this request.

Thank you for your consideration of this request. Please do not hesitate to contact me with any questions.

Sincerely,

Matt Sunseri

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