

Corpus Christi, TX



United States Department of the Interior

FISH AND WILDLIFE SERVICE
P.O. Box 1306
Albuquerque, New Mexico 87103

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CORPUS CHRISTI, TX

APR 16 1997

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Terry Mitchell, Program Specialist
Product Registration Program
Texas Department of Agriculture
P.O. Box 12847
Austin, Texas 78711

Dear Mr. Mitchell:

We have received notice that the Texas Department of Agriculture (TDA) is making a repeat application to the U.S. Environmental Protection Agency (EPA) for an emergency specific exemption under Section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act, authorizing the use of carbofuran (Furadan 4F Insecticide/Nematicide) to control aphids in cotton. Application is for 1.8 million acres of cotton in Texas at the maximum rate of 0.25 pounds active ingredients per acre per application, and two applications are proposed.

A determination cannot be made at this time to merit the use of carbofuran without consideration of previous applications. Our files indicate that this is the fourth year that TDA has requested an emergency exemption for the use of carbofuran to control aphids in Texas. If this emergency exemption pattern continues, perhaps formal registration of this application should be considered.

The U.S. Fish and Wildlife Service is opposed to any type of carbofuran use and has repeatedly urged EPA to cancel all uses. Evidence of carbofuran's toxicity to terrestrial and aquatic fauna is widespread. Numerous wildlife mortalities have been attributed to field applications of the proposed formulation, Furadan 4F, even when used according to label instructions (see enclosure).

In their closing paragraph of the Section 18 approval for the use of carbofuran on cotton in Texas during the 1995 growing season, EPA states that, "EPA is issuing this specific exemption due to an extraordinary combination of conditions that are unique to this year. This Agency does not anticipate the necessity of granting future requests for the use of flowable carbofuran on cotton. Recently registered alternative products, such as imidacloprid, may not be widely available in all cotton-producing areas during this growing season. However, it is the Agency's

expectation that by 1996 that product, and others registered for this use, should provide ample control of this pest problem, therefore, precluding the necessity of additional exemptions allowing the use of carbofuran." Considering that we have received several notices of application and approval for Section 18 emergency exemptions to use imidacloprid in Texas, we assume it is readily available. In addition, there was a recent notice (November 8, 1995) of application for emergency exemption to authorize use of imidacloprid on spinach to control aphids. Consequently, we assume that imidacloprid is effective against aphids and question the necessity of another emergency exemption for carbofuran use on cotton to control aphids.

We appreciate the opportunity to express our concerns related to this application. If you have any questions, please contact Stephen Robertson at (505) 248-6669.

Sincerely,

Paul R. Schmidt
acting Regional Director

Enclosure

cc: Director, FWS, Washington, D.C. (AES/EC)
Environmental Protection Agency, Washington, D.C.
Supervisors, Ecological Services Field Offices, All Texas offices