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Sent: Tuesday, March 12, 2002 10:22 AM
To: NOP, Webmaster
Subject: Spinosad support

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Dear Mr. Mathews:
March 12, 2002

Fruit flies are among the world's most important pests in agriculture. The economic loss that these pests inflict to the agricultural industry as a result of yield reductions, costs of conventional control methods, trade restrictions and environmental impact are estimated in the billions of dollars per year.

A number of large scale and areawide programmes to control fruit flies using an integrated pest management approach based on the Sterile Insect Technique (SIT) are currently being operated in various regions of the world. In order for the SIT to be effective, pest populations need to be suppressed prior to the release of sterile flies to have adequate sterile to fertile overflooding ratios capable of crashing the pest population in a short period of time. To be effective, fruit fly SIT control programmes require that the pest be control, not only in commercial fruit orchards, but also in marginal areas, which often include urban and suburban sites as well as ecologically protected areas. This areawide approach to insect pest control requires the availability of an environmentally friendly and cost-effective insecticide product to complement the sterile fly releases. This responds to the every day more stringent position of environmental agencies towards the use of safer products for pest control and the lowering down of insecticide residues in fruit as part of the food safety initiatives. Moreover, the imminent banning of the methyl bromide for use as a postharvest treatment against fruit flies, worsen the problem as more effective environmentally friendly field treatments for fruit fly control will need to be available. In addition, many of the insecticides that have been normally used for fruit fly control are being banned by the environmental agencies and effective alternatives are urgently in need. One alternative which has already been tested, validated and used at large scale as part of the Medfly SIT eradication programme in Guatemala, Central America, is the organic product spinosad which has shown to be in line with the current trends in pest control and environmental policy.

Given the importance of having an effective alternative for control of these pests and taking into consideration the extensive laboratory testing and field validation of the product spinosad for fruit fly control, this Agency supports the petition submitted by Dow Agrisciences for organic certification of the active ingredient spinosad to the USDA offices of the National Organic Standard Board.

Yours sincerely,

Walther Enkerlin
Technical Officer

