

From: Gilreath, Phyllis R. [PRGilreath@mail.ifas.ufl.edu]
Sent: Thursday, February 14, 2002 4:06 PM
To: NOP, Webmaster
Subject: Spinosad petition

TO: Mr. Richard Mathews,USDA-AMS-TM-NOP

I am writing in support of Dow Agrosience's petition for organic certification of spinosad. This material would be a great addition to the very limited number of insect control materials available to organic producers. There are a number of points that make this material such a natural fit in this arena. The *S. spinosa* bacteria occurs naturally and is NOT genetically engineered. It was one of the first materials to be registered under EPA's reduced risk program and has tolerances for over 265 crops in numerous countries. Spinosad is very safe, both to man and the environment as it is very specific to the insect central nervous system. It is also nonpersistent as it is degraded very quickly. I am familiar with the usefulness of spinosad in traditional vegetable production systems where we have a number of control materials. It would be even more useful in an organic production system where the choice of materials is so very limited. The primary insect controls available to growers I work with are Bt products, oils and soaps. Spinosad has activity on many of the insects these products are used for and in light of all the attention to resistance management, this would allow us to rotate materials in order to preserve the efficacy of the Bt materials. Also, it would target insects such as thrips and leafminers, insects for which we really have no effective organic materials.

With the increased interest in organic production and consumer interest in buy organic products, this material would be a very useful addition to the tools an organic producer has to work with.

If I can provide additional information, please feel free to contact me.

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