

From: Tom A Royer/ento/dasnr/Okstate [rtom@okstate.edu]
Sent: Thursday, March 21, 2002 4:19 PM
To: NOP, Webmaster
Subject: Spinosad petition

I am writing to support the petition submitted by Dow Agrosiences for the organic certification of Spinosad. I believe that this insecticide has some very compelling characteristics that make it a very suitable product for organic certification. I fully understand that there is concern that the inert ingredients in the current formulations will not allow this product to be certified, but I really believe that by certifying the active ingredient, Dow Agrosiences will receive additional motivation to produce a formulation that can meet such standards, and the product will become available to organic growers much sooner than would happen if this petition was denied. I wish to give you several reasons that I think make very compelling arguments to support this product.

1. It is effective. I have looked at this product for control of fall armyworm, and it is effective, and would actually provide a powerful corrective tool for organic growers to use when necessary. I have not known many naturally derived products that have this capability. That fact, in and of itself provides a powerful argument to certify this product.
2. It has a unique mode of action. This will help make it useful for resistance management programs in conjunction with *Bacillus thuringiensis* use. There are a number of insect pests of vegetables that are resistant to Bt, and anything that can be done to extend the useful life of Bt for organic growers is important.
3. It has a wider spectrum of pest activity compared to Bt. This again, makes it a useful tool for use.
4. It has an attractive set of characteristics regarding Environmental and human health hazards.

In conclusion, I believe that this product has a unique, and very attractive set of attributes that make it an ideal candidate for certification. I support the petition.

Sincerely,

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