



State Regulatory Affairs  
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August 25, 2022

Ms. Esther Riechert  
Environmental Health Specialist  
Hawaii Department of Agriculture  
Pesticides Branch, Registration Section  
1428 S. King Street  
Honolulu, HI 96814

**Subject: Thiamethoxam – Listing to State Restricted Use Pesticides**

**Justification for Optigard® Ant Gel Bait to Remain a General Use Product after 12/31/2022**  
**EPA Reg No. 100-1260**

Dear Ms. Riechert:

In your email dated July 6, 2022, you indicated that the active ingredient Thiamethoxam will be officially added to Hawaii's list of State Restricted Use Pesticides. You also indicated that the 4 products listed below containing thiamethoxam that are currently registered in Hawaii will be licensed as State Restricted Use beginning on 1/1/2023 unless we choose to discontinue the product.

Product	EPA Reg No.
Cruiser 5FS	100-941
Demand Duo	100-1653
Optigard Ant Gel Bait	100-1260
Optigard Flex Liquid	100-1306

We have reviewed the current labels for these products and believe that 3 of them would meet the new requirements identified in HAR 4-6-32 (b)(3) to be considered State Restricted Use. However, we believe that Optigard Ant Gel Bait, which was previously approved to be registered by Hawaii Department of Agriculture in June 2007 does not meet the necessary requirements in this regulation. The Hawaii reviewer, Lance Kobashigawa, determined from a review of the label that based on the very low concentration of active ingredient (0.01%) and that the potential for any environmental issues would be low, a review of the environmental fate data would not be necessary to register the product. Additionally, this low concentration gel bait product is only used for structure invading ant species. It is primarily used indoors but can be used outdoors around structures at solid surface points of entry or in tamper-resistant bait stations. Therefore, we believe that contamination or ground water, significant reductions in non-target organisms or fatality to members of endangered species are extremely minimal.

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Therefore, we would like to respectfully request that this product continue to be registered as a General Use Pesticide after 12/31/2022.

If there are questions associated with this action, please feel free to contact me at 800-334-9481 ext. 2151 or [diane.moss@syngenta.com](mailto:diane.moss@syngenta.com)

Sincerely,

A handwritten signature in cursive script that reads "Diane Moss".

Diane Moss  
Regulatory Product Manager  
State Regulatory Affairs