

Comments in Response to Petition to Revoke or Modify Tolerances Established for Carbaryl; Notice of Availability, Federal Register Notice

Date: May 31, 2005

To: EPA

Subject: [Docket ID number OPP-2005-0077](#)

Response to follow-up questions regarding: *Petition to Revoke or Modify Tolerances Established for Carbaryl; Notice of Availability, Federal Register* Notice March 30, 2005 (Volume 70, Number 60) [OPP-2005-0077; FRL- 7705-5]

According to Cooperative Extension staff at the UH College of Tropical Agriculture and Human Resources (CTAHR), carbaryl registrations are vital for many of Hawai'i's diversified agricultural producers. In addition, because it is not a restricted use pesticide, it is an integral pest management tool for many of the immigrant growers. In some instances, growers have the option of using pesticides like carbaryl, malathion, or imidacloprid (Provado or Admire). However, carbaryl seems to be the most affordable option for these growers.

In Hawai'i, tropical fruit producers and certain nursery growers are using carbaryl for chinese rose beetles and ants. Carbaryl is used by some vegetable crop producers, notably growers of sweet potatoes Carbaryl is also used for the control of scales, flea beetles, thrips, pickleworms, tomato pinworms, and other insects.

Comments from a CTAHR Extension Farm Safety Educator:

This opinion is based on "my experience and the farmers' practices with Sevin, past and present.

" I am for keeping carbaryl (Sevin) available for farmers' use especially those of the immigrant growers. This is one chemical compound the farmers from Asia are familiar with. . . . They may have misused [carbaryl] in the past but right now, from my experience working with these farmers, they need a pesticide they can alternate (to prevent insect resistance) with new chemistry pesticides like spinosad and imidacloprid for control of scales, flea beetles, thrips, pickleworms, tomato pinworms, etc. . . . They find [carbaryl] also much more convenient to use because of [the] lack of repelling smell [associated with] other easily available compounds such as malathion. . . . This familiarity and convenience for them will be hard to replace in the mind of these clients. What is realistically needed is continuous education of farmers and users of carbaryl in its proper use, avoiding exposures that will lead to unhealthy farming environment[s].

" I hope this is not another DDT in the making. Now we have malaria killing approximately 1M Africans and Asians in the Third World countries today because of a ban brought about by misuse of supposedly trained people in this country."

Comment received from a representative of the seed production industry:

April 26, 2005

Mr. Mike Kawate
Ms. Kathy Tarutane
IR-4 and USDA

RE: Opposition to the possibility of Carbaryl being revoked by the EPA.

Dear Mike and Cathy,

John McHugh has recommended that I send my comments to you regarding the possibility that Carbaryl use could be revoked by the EPA.

Let me go on record as stating that I oppose this measure. Carbaryl is an important chemistry used throughout the Hawaii seed industry to protect Corn, Sunflower and Soybean from insect pests. Carbaryl when used properly is an additional chemistry we can rely on to control various insect pests affecting our seed crops. When used in rotation with other chemistries, it can help alleviate insect resistance that can occur when the choice of available pesticides is limited.

Please forward this letter in opposition to the proposed revoking of the Carbaryl label.

Sincerely,

Michael Austin

Michael Austin
Agronomist
338-8300

Comments from a local chemical distributor:

To Whom it may Concern:

It seems to me ironic that Environmentalists would encourage growers to switch from a very well known insecticide (of relatively mild toxicity) in this case, Carbaryl, to more potent chemistries like Permethrin, Methomyl and Endosulfan.

Unfortunately, that will be only one of the negative results of this effort by the NRDC to have Carbaryl taken away from the farming community.

I can list some of the others:

- 1) Reduction of alternative chemistries with varying modes of action to combat insect resistance.
- 2) Loss of one of the more affordable insecticides available to most growers.
- 3) Loss of one of the most versatile of the insecticides, used everywhere from the Landscape industry to the Structural Pest Control industry.
- 4) Another blow to American growers trying to compete in the world market, as most certainly, this chemistry will continue to be used in competing countries. Finally, please take into account the cost versus benefit question regarding this decision. I see no benefit in removing this product from the American environment.

Sincerely,

Mark Crowell
Sales Representative
BEI Hawaii

Comments submitted by:

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