

Comments in Response to the Carbaryl IRED
December 27, 2004

EPA Docket OPP-2003-0376

The announcement of the availability of the carbaryl IRED was circulated to members of the stakeholder community in Hawaii and the American Pacific Islands. They were invited to comment on the IRED. Following are compilations of responses received. Affiliations of the responders are indicated in **bold** at the opening of their respective comments.

Seed Corn Industry and Hawai'i Farm Bureau Federation. If the REI for carbaryl is 4 days (30 days to detasseling) Hawai'i's seed corn industry will essentially be without a chemical to control corn earworm. In the 2002-2003 season, the Hawai'i Agricultural Statistics Service estimated the value of this industry to be over \$47 million.

University of Hawai'i Cooperative Extension Agents and Agriculture Chemical Vendors. The small farmers of Hawai'i often sell their produce in farmers' markets. They hand harvest and harvest frequently and they need short PHIs and REIs, particularly for fruiting vegetables, leafy vegetables, cucurbits, beans and sweet corn. The restrictions and extended REI will reduce the number and classes of insecticides available for rotation in pest control programs for agricultural production in Hawaii. From the resistance management standpoint, this could prove disastrous because of our year-round growing season. With longer REIs for carbaryl, growers will rely almost exclusively on pyrethroids (and a few OPs) because these products are available and affordable. The relatively high costs of new chemistry products are prohibitive for many growers. The efficacy of some new products under Hawaii's conditions have not been demonstrated to many growers.

Hawai'i Farm Bureau Federation. How were the new individual REIs determined? Between 12 hours and up to several days, that's a huge difference. Was EPA being too lenient with a 12 hour REI and is now trying to compensate with what in some cases is an eight-fold increase? Also, for brassica leafy vegetables and the leafy vegetables group, a mitigation measure that restricts application to within 30 days of crop emergence or transplanting will be a very large problem for growers, especially the small growers.

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