

Comments in Response to the Notice of Availability of Certain Ethylenebisdithiocarbamates (EBDCs) and Ethylene Thiourea (ETU); Risk Assessments and Preliminary Risk Reduction Options: Hawaii Papaya Industry Association

Date: February 4, 2005

To: Administrator
Office of Pesticides and Toxic Substance
Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

CC: [Cathy Tarutani](#)
American-affiliated Pacific Islands (API) Comment Coordinator
University of Hawaii
Honolulu, HI 96822

SUBJECT: [EPA Docket OPP-2004-0078](#)

My name is Loren Mochida, Director of the "[HAWAII PAPAYA INDUSTRY ASSOCIATION](#)" (HPIA) in the State of Hawaii. Our industry cultivates over 1,700 acres of papaya and supports approximately 350 growers in the state. HPIA is concerned about the future availability of ETHYLENE BISDITHIOCARBAMATES (EBDC) fungicides.

EBDCs are critical to the production of papayas. Since papayas are primarily grown in moist tropical areas, they are highly susceptible to fungal diseases, particularly during the wet winter months. Fungal diseases of papaya are the most important limiting factors affecting fruit quality in papaya shipments from Hawaii. Tree canker, root rot, and fruit rot caused by *Phytophthora palmivora* during heavy rains can devastate a papaya orchard within weeks.

There are hardly any effective fungicides that are presently registered for use on papayas. Copper Sulfate is not as effective as EBDC fungicides and is phytotoxic to papayas under certain condition. Chlorothalonil (Bravo) can be used to control Anthracnose and stem end rots. However, Chlorothalonil has been shown to cause phytotoxicity to the fruit surface after quarantine treatments. Export papayas are required to be heat treated or irradiated prior to exporting due the fruit fly population in Hawaii.

Grower protection when spraying is being monitored by the Hawaii Department of Agriculture (HDOA) and the 24-hour reentry to the field is being adhered to.

EBDCs are the only effective and broad-spectrum fungicide that is available to our growers. The industry humbly requests that the EPA maintain or re-register the EBDC fungicides for use on papayas. This will benefit all the growers and keep the industry alive in the State of Hawaii.

On behalf of the HPIA, please allow me to thank you for your understanding of the benefits of EBDC fungicides in papayas and the importance of it for the survival of the papaya industry.

Sincerely,

Loren Mochida
Director
Hawaii Papaya Industry Association

