

Comments in Response to the Notice of Availability of Certain Ethylenebisdithiocarbamates (EBDCs) and Ethylene Thiourea (ETU); Risk Assessments and Preliminary Risk Reduction Options: Papaya Growers Contracting with Tropical Hawaiian Products

Date: February 4, 2005

To: Dr. Michael Kawate
UHM-CTAHR, Dept. of Plant and
Environment Protection Services
3190 Maile Way, St. John 307
Honolulu, HI 96822

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

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

Dear Dr. Kawate:

I am writing this letter of support for approximately seventy-five (75) papaya growers that have contracted with Tropical Hawaiian Products (THP), a handler, to produce papaya for export to the continental United States and Japan. THP cultivates approximately 1,000 acres of which approximately half is producing papayas at any given time.

THP growers depend on both the Mancozeb and Maneb fungicides to produce export quality papayas and to maximize the longevity of the papaya plant for 3.5 to 4 years. The major problem in the production of papaya is fungi that attack both the fruit and plant. These ethylene-bisdithiocarbamates (EBDC) fungicides have proven to be the most effective material and are sprayed at 2 to 3 week intervals to protect the fruit and plant from infection. This chemical is the standard of industry and is used extensively by all producers of papaya.

The EBDC fungicides have been the fungicide of choice for use on papaya for over 30 years because of its reasonable cost and its effectiveness on two of the most important diseases of papaya; Phytophthora blight and anthracnose.

Tropical Hawaiian Products strongly recommends to the Environmental Protection Agency (EPA) the re-registration of the EBDCs. Without these vital fungicides the papaya growers will slowly lose their crop and export plants will close.

Sincerely,

Loren Mochida
General Manager
Hawaii Papaya Industry Association