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MĀNOA

June 14, 2010

Scott Rawlins
VP, Regulatory & Governmental Affairs
Makhteshim Agan of North America
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

Subject: *Endosulfan Grower Conference Call* — *Hawai'i*

The following comments are being submitted in response to the email message of June 10, 2010, regarding phaseout of the active ingredient **endosulfan**. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use and importance of endosulfan to the production of pineapples in Hawai'i.

Dear Mr. Rawlins:

Thank you for organizing the grower conference call and providing the opportunity for our growers to communicate their needs for endosulfan.

I spoke to Michael Conway of Dole Food Company Hawai'i. Dole's production is on O'ahu and Mr. Conway confirmed that endosulfan is needed by for pineapple production on O'ahu. Mr. Conway expressed strong agreement with the statement provided to you by Calvin Oda. He indicated that the reduced application rates mentioned by Mr. Oda would be acceptable. The pest of particular concern is the sugarcane budmoth larvae. New limitations to the use pattern for diazinon on pineapple will mean that endosulfan is even *more important* to Hawai'i's pineapple growers than had been in the past. At least six (6) years would be required to research alternatives for the endosulfan/diazinon treatment regime. (A possible alternative had been spirotetramat, which remains in EPA's registration pipeline and, therefore, unavailable for research for the foreseeable future.) Dole does use aerial or airblast application methods for endosulfan.

Mr. Conway is willing to provide additional information, if there are questions not covered by Mr. Oda's document. Mr. Conway would welcome any direct communication about endosulfan use in O'ahu pineapple production:

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I understand that the issue of Maximum Residue Limits (MRLs) is not the main topic of discussion at this time. However, Hawai'i's growers have expressed concerns about the retention of MRLs in the *Codex Alimentarius*. They would appreciate the consideration that the MRL for any commodity whose registration is cancelled by EPA also be deleted from the same commodity in the *Codex Alimentarius* despite the minimal dietary risk. This is a particular concern of **Hawai'i's macadamia nut growers**. Removal of such MRLs would be consistent with current efforts toward global harmonization; EPA should work with the international community to improve environmental and worker safety.

These comments have been provided by representatives of Hawai'i's pineapple and macadamia nut industries.

Comments compiled and submitted by:



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