



CALIFORNIA GRAPE & TREE FRUIT LEAGUE

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To: Teung F. Chin, Ph.D., United State Department of Agriculture

From: Gabrielle Kirkland, California Grape & Tree Fruit League

Re: EPA Request for Usage Information for Malathion

Malathion plays a small yet important role in California table grape production. This material serves as an alternative with a significant purpose in the growing community as growers strive to keep their vineyards healthy.

In reviewing the application rates, numbers of applications, and minimum days between applications the industry didn't have any issues with the proposed values with the exception of reentry intervals (REI). Currently, there is a 12-hour REI requirement and EPA proposes a 5-day time frame. A 5-day REI requirement would place a burden on the ability to carry out other cultural practices.

Worker health and safety are very important to table grape growers, and it is hoped that a compromise could be made to the REI time frame. Instead of 5 days would a 2-day REI also provide worker protection? It is important to point out that Malathion isn't a high use material and the occurrence of using the material isn't steady therefore, it doesn't seem unreasonable to have a 2-day REI, if worker safety and health is maintained.

In addition, it is important to understand why Malathion is needed in the industry. The material tends to be less disruptive to beneficial organisms when compared to other materials that are used frequently. These other disruptive materials cause a flare up in a pest or disease thus leading to more material usage to counter the additional pest problems.

This year citrus growers have been using Malathion to treat locusts that have plagued ranches because of the heavy spring rains. This is not a common problem

but having Malathion available is crucial to growers. One table grape operation is expecting to have issues with locusts in their vineyards as the vines mature, and plans to use Malathion. Throughout the season there is a lot of hand labor in training the vine and other cultural activities. To be limited to nearly a week from a vineyard because of a 5-day reentry requirement would be burdensome for growers.

Another grower said because of cultural practices it is very difficult to use products that have a 24-hour or great reentry interval requirement. Malathion is used for mealy bug and leaf hopper and would most likely be applied to the vineyard sometime between mid-April to as late as July. That time frame is critical to when crews are needed in the fields.

Usage in the industry appears to be consistent in the past five years. About 2,000 pounds of Malathion was applied in 2000 and in 2004 some 1,800 pounds were applied, according to the Department of Pesticide Registration's Pesticide Use Reports.

2004

Table and raisin grape growers applied
1,853 pounds with 43 applications on 1,070 acres

2000

Table and raisin grape growers applied
2,094 pounds with 31 applications on 1,252 acres