



UNIVERSITY
of HAWAII®
MĀNOA

July 23, 2010

Joseph Nevola
Pesticide Re-evaluation
Division (7508P), Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave, NW.
Washington, DC 20460-0001

Subject: **EPA-HQ-OPP-2010-0327, Maneb; Proposed Tolerance Actions — Hawai‘i**

The following comments are being submitted in response to the *Federal Register* Proposed Rule of May 26, 2010 (75 FR 29475), regarding EPA’s proposal to revoke all tolerances for the fungicide **maneb**. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use and importance of maneb to crop production in Hawai‘i.

Unused stocks of maneb products remain in the possession of a few growers and in vendors’ warehouses in Hawai‘i. EPA’s belief, as stated in the Proposed Rule of May 26, 2010 (75 FR 29475) (FRL-8826-2) “that end users have had sufficient time to exhaust those existing stocks and for maneb treated commodities to have cleared the channels of trade” is not accurate.

Hawai‘i’s growers are particularly concerned about retaining tolerances for maneb on **cabbages, peppers, lettuce** and **eggplant**. These crops currently have few alternative disease controls. A March 12, 2010 *Federal Register* Notice (75 FR 11884, Docket Number: EPA-HQ-OPP-2005-0307) announced the receipt of applications to register new uses for **mancozeb**. Cabbages, peppers and lettuce were among the proposed uses for three Dow AgroSciences products (62719-387, 62719-396 and 62719-402). However, growers of these crops were unable to predict when mancozeb products would be available for them to use, and they remain unable to predict *whether* mancozeb will even be registered for use on these crops. **Eggplant growers** are in a more difficult situation: eggplant is **not**, one of the crops for which an application for mancozeb registration has been announced.

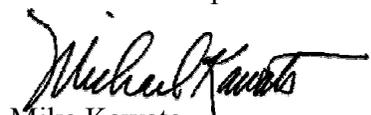
The cancellation order for the last maneb product (Manex, EPA Reg. No. 352-655) was issued on April 16, 2010. “. . . This order permitted persons other than the registrants to sell, distribute, and use existing stocks of the canceled maneb product until supplies are exhausted.” It was not an

unreasonable response for some growers to purchase Manex (which remains available) in order to keep their disease problems under control and, in some cases, maintain a chemical rotation schedule to prevent development of resistance. Disease control is essential for continued crop production.

Growers are also concerned about having to incur the expense of disposing maneb products which may remain after tolerances have been revoked.

These comments have been provided by a vegetable grower and agricultural chemical vendors.

Comments compiled and submitted by:



Mike Kawate
Pesticide Registration Specialist
Voice: 808-956-6008
mike@hpirs.stjohn.hawaii.edu



Cathy Tarutani
Educational Specialist
Voice: 808-956-2004
cathy@hpirs.stjohn.hawaii