
Comments in Response to Petition to Modify or Revoke Tolerances Established for Alachlor, Chlorothalonil, Methomyl, Metribuzin, and Thiodicarb; Notice of Availability Seed corn, celery, cabbage, broccoli, tomatoes, cucumber, papaya

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Subject: Comments in Response to *Petition to Modify or Revoke Tolerances Established for Alachlor, Chlorothalonil, Methomyl, Metribuzin, and Thiodicarb; Notice of Availability Federal Register Notice* ([Docket# OPP-2005-0050](#))

There are a number of important uses for these pesticides in Hawaii.

Alachlor

Under the current situation, if tolerances are revoked and alachlor is NOT available for use on seed corn, the seed corn industry could be irreparably harmed. S-metolachlor (Dual Magnum) is a possible alternative for alachlor. However, changes to the Hawaii Administrative Rules governing pesticides are required for S-metolachlor to become an alternative to alachlor. The changes are not yet approved.

Chlorothalonil

1. Important component of rotational programs. Vegetable growers cannot afford to lose this resistance management and IPM tool. Specific important uses include **celery** (in rotation for blight control) and **cabbage, broccoli, tomatoes, and cucumber**.
2. While not a very common use, chlorothalonil (Bravo) is used in papaya, for crops grown for local consumption. Growers need to retain this use as a possible alternative to the more commonly used mancozeb (Dithane).

Methomyl

Methomyl (Lannate) is one of the few carbamates remaining for use in rotation programs. It is used on **tomatoes, cucumbers, cole crops and corn seed** for lepidoptera type insects among others.

Metribuzin

1. Sencor/Lexone is used at 3/4 lb/A in potato as a preemergence herbicide in about 100 acres in Hawaii.
2. Sencor is used as an pre/post herbicide in sugarcane.

Stakeholder Responses:

Hawaii Farm Bureau Federation:

The Hawaii Farm Bureau Federation expresses concern that the alteration or elimination of tolerances for any of the listed pesticides could have very serious economic consequences for Hawaii growers. All of the listed pesticides are important pieces of the integrated pest management programs for the crops currently listed on their labels except for thiodicarb. With constant year round pest pressure, the loss of these pesticides are potentially devastating for our farmers and especially for the seed producers who comprise a considerable portion of the Hawaii Farm Bureau membership.

Hawaii Agriculture Research Center:

In the crop list for metribuzin, potato and sugarcane should be added. Sencor/Lexone is used at 3/4 lb/A in potato as a preemergence herbicide in about 100 acres in Hawaii. Sencor is used as an pre/post herbicide in sugarcane.

Local chemical distributor:

Just a quick comment on alachlor—Here in Hawaii, the failure of our DOA to license S-metolachlor (Dual Magnum) for use leaves our growers, especially the seed corn industry in a precarious position.

In short, DOA wants to license S-metolachlor (and acetochlor) as RUPs in Hawaii because of a Ground Water Advisory Statement on the label. The manufacturers refuse to allow that to happen so we are at a stalemate—those products will NOT be licensed in Hawaii. (There are exceptions—pre-packs or combination products that have one RUP component, can and are licensed such as Bicep Magnum- atrazine and s-metolachlor.)

S-metolachlor would be the product of choice for most growers but they are "forced" to use alachlor. If tolerances are revoked and alachlor is NOT available for use on seed corn, the seed corn industry could be irreparably harmed. (My opinion.)

This situation is unique to Hawaii.

(update) Thanks for the reminder.

RE: alachlor/S-metolachlor

Might be a non-issue as the HDOA's proposed rules come into effect. While we are a ways off since a series of public hearings must be held prior to promulgation, the new rules do allow for licensing of s-metolachlor in Hawaii (as RUP). (Confusing but manufacturers have refused to VOLUNTARILY license as RUP but if designated RUP by rules, they are OK.)

Another local chemical distributor:

Lasso — Corn seed widely used under brand name Intrro instead of Lasso in Hawaii.

Chlorothalonil — Used in veg crop (celery-rotation) for blight control, other veg crops, i.e. cabbage, broccoli, tomatoes, some papaya, cucumber. Excellent rotational product like Mancozeb, we cannot afford to lose this resistant management and IPM tool.

Lannate — One of the few carbamates left to rotate with. Used on tomatoes, cucumbers, cole crops and corn seed, for lepidoptera type insects among others.

Larvin — Not much used in Hawaii.

Sencor — Mostly used widely in turf for goosegrass control. Very important to the GC industry.

Extension agent:

Hi Cathy,

I guess we would like to have Bravo as a standby should anything happen to Dithane. The problem with Bravo is that it has a sticker already in the fungicide and it causes fruit scalding when heat treated. In the local market it is not a problem. In addition, white skin people (and dark)

tend to get blisters when the product gets on their clothes when picking fruits in the rain. But still a standby fungicide is essential if the alternative is no Dithane.

Response compiled and submitted by:

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