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of HAWAII®  
MĀNOA

March 27, 2009

Dhol Herzi  
Office of Pest Management Policy  
US Department of Agriculture  
1400 Independence Avenue  
Room 3861-South Building  
Washington, DC 20250-0315

Subject: Proposed MRLs

The following comments are being submitted in response to the email message of March 4, 2009 requesting feedback on changes to Pesticide Maximum Residue Limits (MRLs) by Taiwan. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide comments on the potential impacts of the proposed MRLs for **boscalid** and **pyraclostrobin** on **papaya** in Hawai'i.

Hawai'i growers are not selling papayas to Taiwan. Nor does anyone seem to have any plans enter the Taiwan market.

Papaya was found on only one master label for a relevant fungicide licensed for sale in Hawaii. This product, BASF's Pristine (EPA Reg. No. 7969-199) contains both the chemicals for use on papaya mentioned in the table. However, it seems that there are no growers currently using Pristine in Hawai'i, and a major local vendor of agricultural products said it they don't carry this product (even though it is licensed for sale in Hawaii). Papaya does not appear on the Pristine label approved by the Hawai'i State Department of Agriculture.

There are important papaya diseases listed on the Pristine master label, but an extension pathologist said that there are other products available with similar disease control ability.

Therefore, it would appear that the Taiwan's proposed MRLs would have no impact on Hawai'i's papaya growers and we would have no need to comment further on this issue.

Information and comments have been provided by representatives of Hawai'i's papaya industry, Cooperative Extension staff of the College of Tropical Agriculture and Human Resources of the University of Hawai'i at Mānoa, and Hawai'i State Department of Agriculture, Pesticides Branch.

Comments compiled and submitted by:

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