## Permethrin Use in Hawaii

Date: March 15, 2006

To: Jacqueline Guerry

Cc: Rick Melnicoe; Wilfred Burr; Rebecca Sicso; Keith Dorschner; Mike Kawate

From: Cathy Tarutani

Subject: Permethrin proposed crop label changes

Attachment

Dear Jackie,

In Hawaii, there is much concern about the impacts of the proposed permethrin use changes.

I have re-attached the spreadsheet with the affected crops in Hawaii highlighted in yellow.

The reduction of maximum rates may impact farmers in Hawaii of these crops by limiting the pest management tools necessary to control year-round pest pressure. I don't think the proposed reductions would have much impact if the affected crops were grown in an area which did not have year-round production. Some of the insect pests managed by permethrin in Hawaii are corn thrips, corn earworm/tomato fruitworm, various caterpillar and leafhopper/planthopper insect pests.

The use of permethrin on cucurbits has become more critical since the introduction of the pickleworm a few years ago. The pickleworm can be very damaging to all cucurbit crops and starts by attacking fruit at the flowering stage. The reduction in allowable permethrin use would affect approximately 6,000 acres of vegetables and melons grown in Hawaii and 3,500 acres of seed corn (an industry valued at over \$60M annually).

Have we provided sufficient information to address this issue? It is likely that we can get more specifics, in particular about use of permethrin by our seed corn industry, the single most important user of permethrin in Hawaii. However, it may be difficult to meet tomorrow's deadline since some seed corn production is on Kauai. While not in the area devastated by yesterday's flooding, the island has been impacted by weeks of heavy rain. Will there be an opportunity to submit more information?

We welcome the opportunity to work with you again. Please contact us if you have further questions.

Thank you, Cathy

Cathy Tarutani

Department of Plant and Environmental Protection Sciences 3190 Maile Way | voice: 808-956-2004 St John Plant Science Lab., Room 017 | fax: 808-956-9675

University of Hawaii | Honolulu, HI 96822

	CROP	RATE PER APPLICATION Proposed Range	RETREATMENT INTERVAL Proposed	Apps (season Proposed Max	nal max lb AI/A) Current Max	Comments
				0.2 per		
	Alfalfa	0.1-0.2 lb ai/A	30 days	cutting	0.2 per cutting	
		0 0 0 05 11 1/5	10 15 1	0.75	2.0 (0.8 during	
	Almonds	0.2-0.25 lb ai/A	10-15 days	0.75	hull split)	
	Hazelnuts (Filberts)	0.2-0.25 lb ai/A	10-15 days	0.75	1.6	
	Pistachios	0.2-0.25 lb ai/A	10-15 days	0.75	1.6	
	Walnuts	0.2-0.25 lb ai/A	10-15 days	0.75	1.6	
	Apples	0.1-0.25 lb ai/A	10-15 days	0.5	0.6	
	Pears	0.2-0.25 lb ai/A	10-15 days	0.5	0.8	
	Cherries	0.1-0.15 lb ai/A	10-15 days	0.45	1.2	
	Peaches/Nectari					
	nes	0.1-0.25 lb ai/A	10-15 days	0.75	1.5	
	Artichokes	0.1-0.25 lb ai/A	10-15 days	0.75	1.5	
	Asparagus	0.05-0.1 lb ai/A	10-15 days	0.2	0.4	
	Avocados	0.15-0.2 lb ai/A	10-15 days	0.6	1.2	
Cole Crops	Broccoli	0.05-0.1 lb ai/A	10-15 days	0.4	0.8	UPI may seek to increase rate range to 0.05 to 0.2 lb ai/A by future amendment
	Brussels sprouts Cabbage	0.05-0.1 lb ai/A	10-15 days	0.4	0.8	UPI may seek to increase rate range to 0.05 to 0.2 lb ai/A by future amendment
	cabbage	0.03 0.2 ID d1/A	10 15 days	0.1	-	
	Cauliflower	0.05-0.1 lb ai/A	10-15 days	0.4	0.8	UPI may seek to increase rate range to 0.05 to 0.2 lb ai/A by future amendment
Cucurbits	Cantaloupes	0.1-0.15 lb ai/A	10-15 days	0.75	1.6	
	Cucumbers	0.1-0.15 lb ai/A	10-15 days	0.75	1.6	
	Pumpkins	0.1-0.15 lb ai/A	10-15 days	0.75	1.6	
	Squash	0.1-0.15 lb ai/A	10-15 days	0.75	1.6	
	Watermelons	0.05-0.15 lb ai/A	10-15 days	0.75	1.6	
	Eggplant	0.1-0.15 lb ai/A	10-15 days	0.6	2	
	Peppers	0.1-0.15 lb ai/A	10-15 days	0.6	1.6	
	Tomatoes	0.05-0.2 lb ai/A	7-10 days	0.6	1.2	

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rassica)	Celery	0.05-0.2 lb ai/A	10-15 days	0.6	2	
	Lettuce	0.05-0.20 lb ai/A	10-15 days	0.8	2	
	Spinach	0.05-0.2 lb ai/A	10-15 days	0.6	2	
	Collards	0.05-0.15 lb ai/A	10-15 days	0.4	0.8 (0.4 in SC, GA, FL WA)	
	Greens, Turnip	0.05-0.15 lb ai/A	10-15 days	0.4	0.8 (0.4 in SC, GA, FL WA)	
	Corn	0.1-0.15 lb ai/A	10-15 days	0.45	0.6	
	Sweet Corn	0.1-0.15 lb ai/A (0.1-0.2 in FL)	10-15 days	0.6 (0.8in FL)	1.2	
	Garlic	0.1-0.2 lb ai/A	10-15 days	0.8	2	
	Onions	0.1-0.2 lb ai/A	10-15 days	0.8	2	
	Horseradish	0.1-0.15 lb ai/A	10-15 days	0.45	0.6	
	Papaya	0.15 lb ai/A	10-15 days	0.45	1.2	
	Potatoes	0.1-0.2 lb ai/A	10-15 days	0.75	1.6	
	Soybeans	0.05-0.15 lb ai/A	10-15 days	0.3	0.4	
	Apricots					not a registered use
	Beans, Green					not a registered use
	Carrots					not a registered use
	Chicory					not a registered use
	Cotton					not a registered use
	Grapes					not a registered use
	Peas, Green					not a registered use
	Pecans					not a registered use
	Prunes/ Plums					not a registered use
	Sorghum					not a registered use
	Strawberries		·			not a registered use
	Tobacco					not a registered use
	Chicken					not a registered use