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Regulatory Analysis and Development
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Re: Docket No. 03-062-1 – Irradiation of Sweetpotatoes from Hawaii

To whom it may concern:

Public Citizen has serious concerns about the above-referenced interim USDA Rule, which would allow irradiation treatments for sweetpotatoes to be moved interstate from Hawaii.

The Rule acknowledges: “No specific research has been completed on the irradiation doses necessary to neutralize the ginger weevil, the sweetpotato scarabee, or the sweetpotato stem borer.” The Rule states that 400 Gray would be sufficient to inactivate these three species, based on the IAEA’s International Database on Insect Disinfestation and Sterilization, and research conducted by G.J. Hallman.

The IAEA database, however, only contains information for the sweetpotato scarabee; it contains no information for the ginger weevil or sweetpotato stem borer. And, research by Hallman only contains information on irradiation doses that “might” be sufficient to inactivate the ginger weevil, sweetpotato scarabee, and sweetpotato stem borer. Further, the Rule states that USDA research on the sweetpotato scarabee and sweetpotato stem borer is only “preliminary.”

This is of great concern, given the risk ratings for these three pests detailed in the risk assessment – “Pathway-Initiated Risk Assessment of the Importation of Fresh Sweetpotato, *Ipomoea batatas* L. Lam., from Hawaii into the Continental United States”:

- The Pest Risk Potential for the sweetpotato scarabee is High. This includes individual ratings of High for Survive Shipment; High for Not Detected at the Port of Entry; High for Contact with Host Material; High for Dispersal Potential; High for Economic Impact; Medium for Climate-Host Interaction; Medium for Host Range; Medium for Environmental Impact; and Medium for Moved to a Suitable Habitat. According to the University of Hawaii’s College of Tropical Agriculture and Human Resources: “Yield losses...are normally from 15 to 30 percent, but may be as high as 60 to 97 percent if pest populations go unchecked.” (See http://www.extento.hawaii.edu/kbase/reports/sweetpot_prod.htm)

- The Pest Risk Potential for the ginger weevil is High. This includes individual ratings of High for Survive Shipment; High for Not Detected at the Port of Entry; High for Contact with Host Material; High for Host Range; High for Dispersal Potential; High for Economic Impact; Medium for Climate-Host Interaction; Medium for Environmental Impact; and Medium for Moved to a Suitable Habitat.

- The Pest Risk Potential for the sweetpotato stem borer is High. This includes individual ratings of High for Survive Shipment; High for Not Detected at the Port of Entry; High for Contact with Host Material; High for Dispersal Potential; High for Economic Impact; Medium for Climate-Host Interaction; Medium for Host Range; Medium for Environmental Impact; and Medium for Moved to a Suitable Habitat. According to the University of Hawaii's College of Tropical Agriculture and Human Resources: "Heavy feeding results in reduced root growth of up to 50 percent." (See http://www.extento.hawaii.edu/kbase/reports/sweetpot_prod.htm)

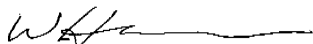
Regarding the other two pests – the gray pineapple mealybug and Kona coffee root-knot nematode – the Rule states: "We believe they can be effectively detected by visual inspection," and that this finding "is consistent with the recommendations of the pest risk assessment." The risk assessment states, however: "Port of entry inspections appear insufficient to safeguard U.S. agriculture."

This is of great concern, given that the Pest Risk Potential for the gray pineapple mealybug is Medium. This includes individual ratings of High for Contact with Host Material; High for Survive Shipment; High for Host Range; High for Environmental Impact; Medium for Moved to a Suitable Habitat; Medium for Economic Impact; and Medium for Not Detected at the Port of Entry.

Finally, the Rule offers no evidence to support its statement that "even if the irradiation treatment leads to increased production of Hawaiian sweetpotatoes, sweetpotato shipments from Hawaii are unlikely to affect mainland producers negatively." Given the opening of markets in the continental 48 states, Hawaii's sweetpotato production will likely increase above its current level of 1.8 million pounds. Annual sweetpotato consumption in the U.S. has remained flat since 1989-91 – at 4.1 pounds per person, according to the USDA's Economic Research Service. Accordingly, lacking an increase in consumption, any increased production from Hawaii would compete directly with producers in the continental 48 states in what amounts to a zero-sum scenario.

Taken together, these flaws render the Rule untenable. We urge the USDA to rescind this interim Rule.

Sincerely,



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