

LINDA LINGLE
Governor



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Chairperson, Board of Agriculture

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August 28, 2006

Mr. Michael Kohn
President
Paina Hawaii
P.O. Box 31264
Honolulu, Hawaii 96820

Dear Mr. Kohn:

This letter is in response to your query regarding our interest to have a second commercial irradiator in Hawaii preferably located at Honolulu International Airport.

As you know, Hawaii has a commercial irradiator on the Island of Hawaii treating tropical fruit and sweet potato for export to U.S. mainland markets. That irradiator has been in operation for approximately five years. The facility is owned by a papaya packer and exporter. In addition to treating papaya of its own production through land lease agreements with growers, the facility treats papaya for independent papaya growers on the island. Independent papaya growers must provide a minimum of 1,000 cases of fruit per week to receive treatment service, however, no more than 2,000 cases per week can be delivered to the facility for treatment.

The bulk of the throughput tonnage for the existing facility is provided by growers located on the Island of Hawaii. For growers elsewhere in the state, the location of the facility in Keeau on the Island of Hawaii has been a limiting factor for the expansion of production for export markets given the high costs of transportation and the limited access to markets from the Island of Hawaii.

As a result, there is great need for a second commercial irradiator in Hawaii, fully accessible to all potential users, located on Oahu, the central hub for transportation both air and sea for Hawaii.

Tropical fruit and vegetable commodities are highly perishable requiring the shortest possible time delay from field to market. Hawaii is also a high cost producer, and for growers in Hawaii to be competitive on the world market, quarantine treatment and other handling costs need to be kept to a minimum.

The location of the second facility at Honolulu International Airport will give our growers access to the widest range of mainland and foreign destinations with the shortest time delays from field and treatment to market.



Further, other initiatives are underway that beg for a second irradiator for Hawaii located on the Island of Oahu, preferably at Honolulu International Airport.

A major effort is underway to establish a new biosecurity system for the State of Hawaii. Hawaii has the dubious distinction of having more threatened and endangered species of any state in the union. Much of the environmental pressures that have resulted in the loss of biodiversity in Hawaii have been a result of the loss of native habitat to pest species. Some of these "pests" were intentional introductions; others arrived as hitch hiking pests, primarily on agricultural commodities as fresh fruits and vegetables, cut flowers and foliage plants, brought into the state to sustain the growth of our economy.

The need to keep pests out of the state is a top priority of the state and its federal, county and private sector partners. Recognizing this, the State Civil Defense has just approved a \$100,000 grant to the Hawaii Department of Agriculture for preliminary planning and design for a joint use inspection facility at Honolulu International Airport for State Plant Quarantine, USDA, APHIS, Plant Protection and Quarantine, and for Homeland Security, Customs and Border Protection. The purpose of this joint inspection facility, which could be several acres under one roof, is to assure the most efficient and effective inspection of agricultural products entering Hawaii by three plant quarantine (one state and two federal) agencies. The joint inspection facility is also a pilot effort to test information sharing and collaboration across jurisdictional lines, a national priority of Federal Homeland Security.

The joint use inspection facility for Hawaii is an important component of highly complex initiative to expand and make biosecurity orders of magnitude more effective and efficient in the state. To this end, the State Legislature doubled the staffing of State Plant Quarantine in FY 2006; we anticipate the program will be again doubled in size and resources in FY 2007. A consequence of this effort to assure that we find and prevent the movement of pests into the state is the dilemma of the find and the need to destroy or send back to sender agricultural products that otherwise have high value and quality except for the presence of hitch hiking pests "not known to be present in the state". The HDOA rejected 125 LD3 containers of fresh strawberries several years ago and continue to reject dozens of containers of strawberries and other commodities yearly as a result of pests of quarantine concern to Hawaii. These strawberries could have been treated in an irradiator at low doses that would have mitigated the pests risk at the same time extended the shelf life of the strawberries on market shelves. Hawaii is not in a position to regulate incoming produce as Japan or even California, based on a seemingly zero tolerance standard. Should Hawaii attempt to impose a zero tolerance standard, suppliers would most certainly choose to abandon the state. The expansion of state biosecurity to prevent entry of pests begs the need for post entry commodity treatment. Irradiation has the broadest application for post entry quarantine treatment and would be a critical component to assure the success of state and federal plant quarantine in Hawaii.

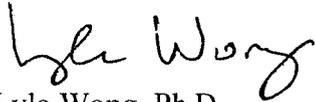
The state recently funded (FY 2004) a \$130,000 study to the University of Hawaii on the application of low dose irradiation for the treatment of cut flowers for pest control. Thousands of boxes of cut flowers and cut greens enter Hawaii each year for the florist trade, far more than can be visually inspected by inspectors. The treatment of flowers for pest control through an

irradiator at Honolulu International Airport is a viable alternative to visual inspection one box after another.

In addition to the above, you are well aware that Hawaii is a major supplier of sterile fruit fly pupae for "preventative release" programs in California to prevent the Mediterranean fruit fly from becoming established in that state. The rearing facility in Hawaii is owned and operated by the California Department of Agriculture. CDFA would like to double the size of its existing fruit fly rearing facility and to possibly increase capacity to 400 + pupae per week. Two Husman Cesium – 137 irradiators owned and operated by the USDA, APHIS, PPQ currently sterilizes the current production of the CDFA facility. Should CDFA expand its facility as planned, CDFA will need additional treatment capacity for the sterilization of the pupae on a timely basis. The Husman would take an estimated 16 hours of continued operation to sterilize 1,400 pounds of pupae per day and this is totally unacceptable. CDFA would have to build its own irradiator to meet its needs, or to contract out this service as an alternative. One option would be to ship the pupae to Keeau on the Island of Hawaii on a daily basis for the treatment. We understand CDFA as well as USDA would prefer to treat the pupae on Oahu to minimize delays and additional handling steps and to reduce the risk of mishaps in the handling of a highly fragile commodity that must be sterilized without room for error to avoid the release of fertile fruit flies on the U.S. mainland.

All the above said, please be advised that a second commercial irradiator in Hawaii is in the interest of the diversified agriculture in Hawaii, the biosecurity of the State of Hawaii, and critically important infrastructure need for the fruit fly rearing program in Hawaii, and therein, has the strongest interest and support of this department.

Sincerely,

A handwritten signature in black ink that reads "Lyle Wong". The signature is written in a cursive, flowing style.

Lyle Wong, Ph.D.
Plant Industry Administrator