

Minor Crop Farmer Alliance

Via *Electronic Docket Submission* <http://www.regulations.gov>

March 15, 2022

Mary Reaves, Ph.D.
Acting Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: Request for Extension of the Comment Period for the Proposed Interim Decisions for Ferbam, EPA-HQ-OPP-2015-0567; Thiram, EPA-HQ-OPP-2015-0433; Ziram, EPA-HQ-OPP- 2015-0568; and Iprodione, EPA-HQ-OPP-2012-0392

Dear Dr. Reaves:

This request for extension of the comment period for the subject Proposed Interim Decisions (“PIDs”) for the four listed fungicides is submitted on behalf of the Minor Crop Farmer Alliance (“MCFA”) and its members. On February 3, 2022, the U.S. Environmental Protection Agency (“EPA” or “Agency”) published a notice in the Federal Register announcing the availability of the subject PIDs for comment, with such comments due by April 4, 2022. (87 Fed. Reg. 6169-70).

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers and processors of various agricultural commodities, including food, fiber, turf grass, nursery and landscape crops, and organizations involved with public health pesticides. MCFA’s members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators, workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans and non-target organisms such as pollinators. While our commodities are often called “minor crops” or “specialty crops,” they contribute to the diverse and highly nutritious diets available for the global population, and to safe and aesthetic surroundings for our homes, schools, and places of business. These U.S. farmers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery and turf grass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than \$60 billion, or approximately 40%, of total U.S. crop receipts.

The subject fungicides are used on several of the crops grown by MCFA members and maintaining access to them is important. For example, for the cherry growers, these products are used to help address leaf-spot and American brown rot diseases. For growers in the Northwest, these products are used on pome fruit to help control the post-harvest bull’s eye rot (*Neofabraea* spp.), blue mold (*Penicillium expansum*), grey mold (*Botrytis cinerea*), and speck rot (*Phacidiopycnis washingtonensis* in apple; *Phacidiopycnis pyri* in pear). They are also used to help control of apple scab (*Venturia inaequalis*), and bitter rot (*Colletotrichum* species). They

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also help Florida strawberry growers control various diseases such as Botrytis in accordance with the Florida Strawberry Advisory System guidance. Additionally, equally important, these products also help play a significant role in addressing disease resistance issues for various commodities.

MCFA members are actively reviewing the PIDs. Fortunately, the U.S. Department of Agriculture Office of Pest Management Policy (“OPMP”) has made itself available in helping to identify additional information that affected growers should consider collecting to help better inform the Agency in its review of these chemicals. However, additional time simply is needed to prepare meaningful comments. For example, additional time is needed to collect more recent information, data and real-world examples on the important role of dithiocarbamates and iprodione in:

- the increasing incidence of single-site fungicide resistance in a particular crop;
- the management of new and emerging diseases recently diagnosed in a niche crop of a particular region/state;
- Comparative risks, advantages and disadvantages of what available alternatives can offer; and
- incorporating with newer technologies (disease forecasting tool, targeted delivery/placement, improved formulation, biocontrol agents, etc.) that will mitigate the risks identified.
- Providing measurable socio-economic impacts of losing dithiocarbamates and iprodione such as yield, market quality of harvested crop, trade, operational costs, etc.

Further, it is understood that the registrants of Thiram and Ziram have submitted a request for a brief extension of the comment period to July 1, 2022. The extension request was to allow the development of additional data that could help the Agency refine the potential exposure to these chemicals. MCFA certainly supports that request.

In view of the foregoing, MCFA is submitting this extension request. Please let me know if any additional information is needed or if you have any questions. We appreciate your consideration of this request.

Sincerely,



Mike Aerts, Co-Chair
MCFA Technical Committee

Cc: Marisa Wright