Arizona Farm Bureau Federation
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November 13, 2017

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2013-0074; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – trifloxystrobin

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over $23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessment of trifloxystrobin, as we believe it does not fully recognize the critical role this chemistry provides to the success of some of Arizona's agricultural crops.

Trifloxystrobin is a fungicide with primary reported uses in Arizona's corn and melon crops and is applied to treat primarily rust and powdery mildew. According to Dr. Alex Hu, Extension Plant Pathologist with the University of Arizona, trifloxystrobin is used to control powdery mildew in melons and southern corn leaf blight in corn, among other diseases. While these are the primary uses in the state, it is also used on pistachio to control Septoria leaf spot, which requires several sprays per season to reduce defoliation.

As a major melon producing state, ranking second in the nation in cantaloupe and honeydew production, powdery mildew is an annual concern for the state's melon growers. Severe cases of this disease can be economically devastating. The disease results in powdery spots that can cover the stems and surface of the leaves. Leaves in severe and chronic cases may die, resulting in poor plant canopy. Consequently, the fruit (melons) may ripen prematurely, sunburn, and be of poor quality.[1] There are now at least three different races of cucurbit powdery mildew pathogens in melons, and to inhibit further resistance development to one or more active ingredients, application of products with different

[1] Matheron, M.E. and M. Porchas. June 2004. Comparison of Products for Management of Powdery Mildew on Cantaloupe. University of Arizona Cooperative Extension, Yuma County Farm Notes. https://cals.arizona.edu/crop/counties/yuma/farmnotes/2004/fn0604powdery.html

modes of action is necessary.[2,3] Consequently, it is imperative that melon growers retain crop protection tools, such as trifloxystrobin, to preserve their ability to manage powdery mildew efficiently and effectively.

Corn in Arizona is primarily grown for animal feed and is an important input for the state's dairy producers. A concern for dairy producers is ensuring they have high quality feed for their cows. Rust, like powdery mildew, affects the leaves of the plant. The rust acts like a parasite that diverts nutrients from the plant for fungal growth. It also damages the surface of leaves that in severe cases can reduce the plant's water use efficiency. The issue with rust in corn is the speed at which it can reach damaging levels when conditions are favorable.[4] According the Corn Disease Working Group, trifloxystrobin has an excellent efficacy rating for controlling rust in corn.[5] Given the type of damage rust does to a plant and the speed at which it can spread, it is important that growers have access to products like trifloxystrobin to protect not only crop yields, but crop and feed quality as well.

Trifloxystrobin is an important tool for many growers in our state and we do not believe that this product, which has been used for many years, poses an unreasonable risk to human health or the environment. All crops grown in Arizona on which trifloxystrobin is used would be negatively impacted if it were no longer available as a crop protection tool. For those reasons, we urge the EPA to continue to allow its use.

Sincerely,

Stefanie A. Smallhouse

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

[2] Matheron, M.E. Effective Management of Melon Powdery Mildew in the Desert. https://cals.arizona.edu/crops/presentations/Matheron-ImperialCountyMtg-melonPM.pdf

[3] Matheron, M.E. and M. Porchas. January 2008. Examination of Fungicides for Management of Powdery Mildew on Cantaloupe in 2007. Vegetable Report (P-152). College of Agriculture and Life Sciences, University of Arizona. http://arizona.openrepository.com/arizona/bitstream/10150/215032/1/az14381c-2007.pdf

[4] Wise, K. Diseases of Corn Common and Southern Rusts. Perdue Extension, Perdue University. https://www.extension.purdue.edu/extmedia/BP/BP-82-W.pdf

[5] Wise, K. January 2017. Fungicide Efficacy for Control of Corn Diseases. Perdue Extension, Perdue University. https://www.extension.purdue.edu/extmedia/bp/bp-160-w.pdf