



Arizona Farm Bureau Federation

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November 2, 2020

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-2012-0392; Registration Reviews Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Iprodione

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 assessments of iprodione (EPA-HQ-OPP-2012-0392) and the critical role this chemistry provides to the success of a number of Arizona's agricultural crops, most notably lettuce and to a lesser extent cole crops and onions.

Iprodione is a fungicide that is used to address the fungus *Sclerotinia* which causes leaf drop in lettuce, as well as *Alternaria* that leads to stem rot in broccoli. Both diseases can cause significant crop damage. In Arizona, the Yuma growing region leads the nation in lettuce production from November to April and is known as "America's Winter Lettuce Capital." A threat to the successful cultivation of lettuce in this growing region is lettuce drop. Crop losses vary from 1% to 75%, and in some cases, entire fields may be lost (Chitrampalam et al 2008).¹ The monetary losses to the industry from this disease can be staggering ranging from \$6 million to \$18 million depending on annual disease pressures (M. Matheron 2017).² While similar crop loss data is not available for broccoli, Arizona broccoli production in 2019 was valued at \$86 million.³

¹ Chitrampalam et al 2008. Plant Dis. 92:1625-1634)

² Matheron, M. "Maximizing Effectiveness of Fungicides for Control of Lettuce Drop in Arizona." USDA Research, Education & Economic Information System website - <https://reeis.usda.gov/web/crisprojectpages/0229547-maximizing-effectiveness-of-fungicides-for-control-of-lettuce-drop-in-arizona.html>.

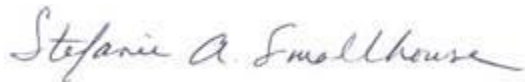
³ USDA-NASS. 2020. 2019 State Agriculture Overview. United States Department of Agriculture, National Agricultural Statistics Service. Accessed at: https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=ARIZONA

Addressing Sclerotinia spp. can be challenging as the pathogen lives and persists in the soil. One method to control the fungus, or suppress the fungus as one Pest Control Advisor (PCA) noted, is through chemical controls like iprodione, which is applied by ground or chemigation. Iprodione is also an important component of resistance management and is used in rotation with several other fungicide products.

In spite of the economic crop losses that can occur as result of Sclerotinia and Alternaria, the overall usage of iprodione in the crops noted above represents only a small percentage of the total crop acres on an annual basis. One explanation for this is that iprodione is an expensive product, thus resulting in targeted and selective field applications – only applying iprodione to those fields with a history of Sclerotinia. It also may be the case that alternative products, which are reported to be equally effective are often being used in its place. However, at least one PCA has noted that the alternative products are even more costly than iprodione. Even with the lower overall usage of iprodione and equally effective alternatives we support retaining its use for the critical role it plays in resistance management programs.

Iprodione is an important crop protection tool for many growers in our state and has been used for many years without evidence of an unreasonable risk to humans or environmental health. The Arizona crops on which iprodione is used benefit from its availability for crop protection and resistance management, and would be negatively impacted if it were no longer available or if major restrictions were implemented on its use. For those reasons, we urge the EPA to continue to allow its use.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse".

Stefanie Smallhouse, President
Arizona Farm Bureau Federation