Arizona Farm Bureau Federation
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October 4, 2021

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-2016-0141; Registration Reviews Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Dicloran

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 dicloran and the important role this chemistry provides to the success of Arizona's agricultural crops.

According to the Arizona Pest Management Center (APMC) Pesticide Use Database, the only current reported uses of dicloran is on celery, with 300 to 700 acres treated annually over the past five years. Prior to 2013, some regular use on head and leaf lettuce was reported.

Dicloran is a fungicide used to address fungal diseases impacting various crops. In celery, where dicloran is used most consistently over a significant number of acres, it is an effective treatment against pink rot (Sclerotinia sclerotiorum). Although Arizona's environment is generally dry, wet weather creates the ideal environment for growth of fungal diseases that can result in significant yield and quality losses. Pest control advisors (PCAs), who work closely with growers to make pest management decisions, noted the importance of retaining the use dicloran of as a fungicide option.

Dicloran is also noted to treat Sclerotinia in lettuce and was used in Arizona on a relatively small percentage of acres up until 2013. According to PCAs in the Yuma lettuce growing region, dicloran applications left a residue on the leaves, which diminished the aesthetic quality of the produce. Another PCA noted that there are currently more effective fungicides on the market for use in lettuce which do not leave a visible residue.

In Arizona celery production, dicloran is considered an effective fungicide tool and is either applied on its own or in a tank mix with Tilt (propiconazole) as a preventative treatment. A single application at a rate that is either at or near the full rate is generally made when the celery is still small. The majority of applications are done by air, because celery is watered every 7 to 10 days, making it difficult to access the fields with ground equipment. However, some use of ground applications is also reported. PCAs

consider dichloran to be crucial to celery production in Arizona. It is part of a standard preventative treatment for Sclerotonia, which is both effective an economical. The yellowish residue on leaves is not problematic for celery, since the stem is the primary product, unlike lettuce.

Because fungi are adaptable organisms and can become resistant to fungicides, ensuring dicloran continues to be available is important for maintaining a robust fungicide resistance management program. According to Mike Matheron, former University of Arizona Extension Plant pathologist, such a program should rotate among products with different modes of action to delay development of resistance to active ingredients within a pathogen population.[1]

Dicloran 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 human or environmental health. All crops grown in Arizona on which dicloran is used would be negatively impacted if it were no longer available or if major restrictions were put on its use as a crop protection tool. For those reasons, we urge the EPA to continue to allow its use.

Thank you for your consideration.

Sincerely,

Stefanie A. Smallhouse

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

[1]Matheron, Michael. "Biology and Management of Downy Mildew of Lettuce." College of Agriculture and Life Sciences Cooperative Extension, az1682, September 2015.Available online at https://desertagsolutions.org/sites/desertagsolutions.org/files/az1682-2015%20downy%20mildew%20of%20lettuce%20Cooperative%20Extension%20Publication_MM.pdf