



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

May 26, 2022

The Honorable Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Dear Administrator Regan,

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. In light of the EPA's Notice of Intent to Suspend the manufacturing of dimethyl tetrachloroterephthalate (DCPA) (Docket No. EPA-HQ-OPP-2011-0374-0012), our comments below highlight the important role this chemistry provides to the success of Arizona's agricultural crops. According to Arizona Pesticide Use Data, DCPA is used mainly on broccoli, cabbage, cauliflower and other Cole crops, as well as onions, with less frequent use in a variety of vegetable greens. According to the USDA's National Agricultural Statistics Service, Arizona in 2021 produced a combined 21,000 acres of broccoli, cauliflower and cabbage valued at over \$220.4 million.¹ Arizona is an important producer of high-quality seed onions which are exported and grown in the Pacific Northwest and elsewhere.

DCPA Applications in Arizona

DCPA is considered by both growers and pest control advisors (PCAs), who work closely with growers to make pest management decisions, as the most efficacious herbicide option "by far" for weed control in Cole crops (including broccoli seed). Although DCPA costs significantly more than alternative herbicide options, due to its effectiveness, PCAs commonly consider the product an industry standard, in particular for Cole crops. PCAs report that a single application of DCPA is sufficient in most cases as a full-control program for the season, with little to no additional herbicide applications or hand weeding required later in the season.

Alternative herbicides include oxyfluorfen (e.g., Goal, Goldtender) and bensulide (e.g., Prefar). However, because these alternatives are not as effective, additional herbicide treatments and/or hand weeding is required later in the season. As the cost of labor continues to increase, and the availability of farm

¹ USDA-NASS. 2022. 2021 State Agriculture Overview. United States Department of Agriculture, National Agricultural Statistics Service.

https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=ARIZONA

workers dwindle, the importance of having a highly effective herbicide like DCPA that reduces the need for additional weed management utilizing hand labor becomes increasingly important.

In Arizona's onion production, including onions grown for seed, DCPA is again considered an industry standard. One of the most problematic weeds to control in this crop is purslane and compared to alternative products DCPA is the most effective. As with broccoli, weeds that appear later in the season often require hand weeding – a significant (and increasing) expense, which can generally be avoided with the use of DCPA.

The alternative herbicides noted above for broccoli production are also options in onion production. However, because these alternatives are not as effective, additional herbicide applications and/or hand weeding are commonly needed, increasing the overall cost of weed control and potentially reducing yields.

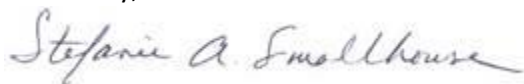
According to USDA NASS data, since 2011 an average of 9,182 acres of broccoli were planted annually in Arizona. The average annual reported application of DCPA during that same time period was about 2,472 treated acres, according to the Arizona Pest Management Center (APMC) use database. While this indicates that DCPA is applied to just over a quarter, nearly 27%, of total planted acres, this is very likely an underestimate of actual use. Because Arizona does not require 100% use reporting, APMC's data tends to underestimate certain applications, such as herbicides applied by private growers, which do not require reporting in most cases.

USDA NASS discontinued estimating the annual planted acres for onions in Arizona in 2010. Since that time, only harvested acre estimates are available and were most recently reported in the 2017 Arizona Census of Agriculture Report. In 2017, the number of reported DCPA treated acres was 284 (13 %) out of total acres harvest of 2,164. Again, we reiterate that this is likely an underestimate and not all DCPA usage is reported. Despite the shortcomings of the data, it is clear that DCPA is an important crop protection tool for Arizona growers.

We understand EPA has regulatory responsibilities required under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), including managing the Registration Review Process for pesticides to insure their continued use does not cause undue harm to human health and the environment. It is our understanding that that the registrant of DCPA, AMVAC, has been actively engaged with EPA in responding to the various studies required by the agency and that some of these studies are forthcoming. We also understand that AMVAC intends to request a hearing as outlined in the Federal Register Docket No. EPA-HQ-OPP-2011-0374-0012. We urge EPA to consider our comment above regarding the importance of DCPA to Arizona growers as it works cooperatively with the registrant to resolve the issues that resulted in the Notice of Intent to Suspend DCPA.

Thank you for your consideration.

Sincerely,

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

Stefanie Smallhouse, President
Arizona Farm Bureau Federation