



## *Arizona Farm Bureau Federation*

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April 4, 2022

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-2012-0392-0055; Proposed Interim Decisions for Several Pesticides –  
Iprodione

To Whom It May Concern:

The Arizona Farm Bureau represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion in economic impact to the state. Many of our members rely on iprodione as a crop protection tool to produce high quality crops and sustain their operations. Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision (PID) for iprodione.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and/or ecological risk assessment for iprodione (Docket ID # EPA-HQ-OPP-2012-0392-0047), we noted the importance of this product as a crop protection tool for Arizona farmers. We request incorporation of these previous comments for consideration in EPA's current comment period.

The EPA's PID for iprodione proposes to limit all outdoor uses, including agricultural uses, to one application per year. In our outreach to several pest control advisors who are familiar with the use of iprodione, a single application of the product is the general practice for the primary crops on which iprodione is applied in Arizona (i.e., lettuce, broccoli, onion, and broccoli and onion seed). Additionally, we support the comments prepared by the Arizona Pest Management Center (APMC), which provide additional details regarding the one application per year limit.

Iprodione is an effective and economical fungicide option for several important crops grown in Arizona. We support its continued availability and encourage EPA to refrain from imposing any further limitations on its use as it finalizes the interim decision for iprodione.

Thank you for your consideration.

Sincerely,

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation