FLORIDA FARM BUREAU FEDERATION
THE VOICE OF AGRICULTURE

July 31, 2024

Timothy Kiely
Environmental Protection Agency
Pesticide Re-evaluation Division
Office of Pesticide Programs
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Docket ID Number: EPA-HQ-2008-0915-0058, EPA-HQ-OPP-2013-0296, EPA-HQ-2015-0567, EPA-HQ-OPP-2015-0433, EPA-HQ-OPP-2015-0568

RE: EPA-HQ-2008-0915-0058 – Pesticide Registration Review: Proposed Decisions for Several Pesticides – Acephate Case Number 0042, Captan (Amended) Case Number 0120, Ferbam (Amended) Case Number 8000, Thiram (Amended) Case Number 0122, Ziram (Amended) Case Number 8001

Dear Mr. Kiely:

The Florida Farm Bureau Federation (FFBF) appreciates the opportunity to submit comments regarding the United States Environmental Protection Agency (EPA) proposed interim decisions (PIDs) for the following pesticides: Acephate (Case Number 0042), Captan (Case Number 0120), Ferbam (Case Number 8000), Thiram (Case Number 0122), and Ziram (Case Number 8001).

FFBF is a grassroots organization representing 132,000 member-families, a majority of whom we anticipate being impacted by the PIDs for the previously listed pesticides. FFBF has serious concerns with the PIDs as proposed due to Florida's subtropical and tropical climates. These conditions are ideal for pests during their long growing seasons, which can further exacerbate resistance and intensify challenges with mitigation. These PIDs will revoke tools that are imperative to successful crop production in the State of Florida. On behalf of Florida agriculture, we are concerned that these PIDs will ultimately jeopardize the future of farming across not only Florida, but also across the United States.

FFBF recognizes the ongoing challenges the EPA is facing regarding the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and supports the agency in meeting these statutory requirements. Furthermore, FFBF is committed to working with the Agency to find a path forward that will maintain accessibility of registered use products while also protecting federally threatened and endangered (listed) species or designated critical habitats.

Below, we outline the importance and necessity of each of these chemistries in Florida's agricultural production. Additionally, we make recommendations the Agency should seriously consider by underscoring the environmental stewardship and worker protection standards in which Florida's farmers and ranchers are actively engaged.

With that being said, FFBF cannot support EPA implementing these PIDs which would significantly and irreparably harm thousands of farming operations, regardless of any timelines to which the Agency is committed. To that end, we oppose the PIDs for Acephate, Captan, Ferbam, Thiram, and Ziram as proposed and strongly urge the agency to re-evaluate the PIDs to be based on sound science.

Acephate

The cancelation of virtually all uses of Acephate would be detrimental to Florida's annual 90,000 acres of upland cotton production. EPA's Biological and Economic Analysis Division (BEAD) Acephate usage and benefits document (EPA-HQ-OPP-2008-0915-0066) provides an accurate depiction of the uses of Acephate across the Cotton Belt.

Acephate is considered the industry standard for managing thrips, plant bugs, fleahoppers, and stinkbugs and serves as the cornerstone for thrips and tarnishes plant bug (TPB) control in cotton. In addition to these primary insect pests in cotton, Acephate is also commonly recommended as a control option for occasional and secondary pests such as banded winged whiteflies, cutworms, and fall armyworms. Despite other insecticides being registered, Acephate remains an important component in pest control programs in cotton. The absence of Acephate would severely hinder Integrated Pest Management (IPM) and Integrated Resistance Management (IRM) programs designed to manage these pests. Losing Acephate as a cost-effective tool could lead to an increase in overall insecticide usage, accelerated development of resistance, elevated production costs, and diminished profitability. The loss of Acephate coupled with already historically high input costs will cause a sharp decline the cotton supply chain, which is worth $75 billion in the U.S. economy.

Captan & Ziram

Captan is widely used broad-spectrum fungicide to control Botrytis fruit rot (BFR) and anthracnose fruit rot (AFR) in Florida-grown strawberries. Additionally, Captan is used in blueberry production to treat Botrytis (Gray Mold), Alternaria rot, Anthracnose leaf spot, amongst other fungal diseases.

In Florida agriculture, Ziram is recommended for use in blueberries to combat Alternaria Rot, Ripe Rot, Anthracnose leaf spot, Gray Mold, and Phomopsis Twig Blight.

Additionally, Ziram is labeled for use in tomatoes (excluding cherry tomatoes) to proactively treat anthracnose, early blight, and Septoria leaf spot.

These broad-spectrum fungicides are essential chemistries for growers to use in rotation when treating the aforementioned fungal diseases in strawberries, blueberries, and tomatoes, respectively.

Ferbam

In Florida agriculture, Ferbam is primarily used in citrus production to control blossom blight and post-bloom fruit drop caused by Colletotrichum. This is particularly a concern in Valencia and Navel Oranges. Ferbam is labeled for application via groundboom, airblast sprayers, and sprinkler and drip tape irrigation.

In addition to the immense pressures Florida citrus production is facing due to Huanglongbing (HLB or citrus greening), it is also facing severe decline at the expense of Colletotrichum. One of the primary indications that a tree is infected with HLB and/or Colletotrichum is fruit drop. Being as there is no cure for either of these diseases that plague Florida citrus, tools, such as Ferbam, to combat the fruit drop from Colletotrichum are essential to the productivity of groves.

As ninety percent of Florida's oranges are grown for juicing, which is largely made up of the Valencia variety, the loss of Ferbam could put both Florida orange juice and fresh citrus sector in further jeopardy.

Thiram

Thiram is a commonly used fungicide within the Florida strawberry industry. The warm humid conditions of Florida, often present even during the winter months, are optimal for fungal outbreaks, making disease pressures a continuous concern. Among our producers, Thiram has proven to be the most effective safeguard against disease, specifically Botrytis fruit rot, anthracnose, and Neopestalotiopsis. Pestalotia is another fungal disease that is of grave concern to strawberry growers. Although Pestalotia Leaf Spot and Pestalotia Fruit Rot was first discovered in the 1970s, it was not until the 2018-2019 crop year that strawberry growers in the state experienced severe and unprecedented outbreaks. There are currently no chemistries labeled to treat Pestalotia Leaf Spot and Pestalotia Fruit Rot. The looming threat of Pestalotia coupled with the loss of adequate IPM tools, including Thiram, further jeopardizes the viability of domestically grown strawberries.

Farmworker and pesticide applicator safety are of paramount concern to all producers, including those who apply Thiram. According to the manufacturer, Thiram is only available for sale in markets, like strawberry production, in the liquid formulation.

Meaning, any potential risks associated with dust and mixing using a dry formulation are entirely mitigated. Additionally, it is common practice to apply Thiram from an enclosed tractor, which further minimizes exposure risk. Furthermore, none of the suggested chemistry alternatives match Thiram's capabilities for full-season coverage, gravely limiting applications throughout the season. As strawberries are re-picked as soon as every three days, the need for multiple applications within a season is consistent within commercial strawberry production across the United States. Lastly, the loss of Thiram would cause growers to depend on Switch (Active Ingredients: Cyprodinil, Fludioxonil) as the only effective fungicide for strawberries. With only one effective fungicide available, the crop will quickly increase tolerance, and the grower will be forced to increase application rates and/or frequency. Which, consequently, is the opposite of what the EPA and the grower strive for in their respective positions.

With over fifty years since Thiram has been registered, and no documented incidents of harm, it has proven to be a safe and effective chemistry with little to no risk of farmworker dermal absorption. As strawberry production is a $1.5 billion industry in the State of Florida, the loss of Thiram would not only be detrimental to the agricultural economy, but also the State's economy.

Florida Agricultural Producer Stewardship

The health of Florida's environmentally critical lands is of utmost importance to our growers. So much so, that many of Florida's farmers and ranchers participate in the Florida Department of Agriculture and Consumer Services' (FDACS) Best Management Practices (BMP) Program. This extensive program operates under three main goals: (1) nutrient management, (2) irrigation management, and (3) water source protection. These three goals are consistent with EPA's obligation to protect federally threatened and endangered (listed) species or designated critical habitats.

Additionally, our State's producers are mandated to be in compliance with the Florida Agricultural Worker Safety Act. The intent of this Act is to ensure Florida's agricultural workers and pesticide handlers receive protection from and are educated on agricultural pesticides. The requirements of the agricultural employers for their agricultural workers and pesticide handlers include: (1) providing training, (2) providing specified decontamination supplies, (3) providing information to employees to ensure they know what, where, and when pesticides have been applied, (4) providing emergency assistance in the case that an employee becomes sick from pesticide exposure.

Conclusion

While FFBF supports EPA in complying with its legal obligations under FIFRA, we cannot support the PIDs as proposed. This interim decision proposal presents a myriad of implications to the United States' agricultural industry in the lower 48 states.

This decision's impacts will go far beyond Florida, as Florida's farmers and ranchers are the primary supplier of food and fiber to the eastern half of the United States during the winter months. These PIDs will risk sacrificing national security without the proper tools for the United States to provide an affordable, safe, and sustainable food supply domestically.

Additionally, with the intense pressure for development in Florida with 800-1,000 people translocating daily to the state, removing the narrow edge of profitability of working agricultural lands further exacerbates development removing environmentally critical lands forever. Furthermore, in 2023, over 140 million people visited the State of Florida. While Florida welcomes these tourists and the opportunity to bolster the economy, it is important to consider the high-risk Florida is at for noxious weeds and invasive pests brought and left by visitors.

As we have expressed above, FFBF does not support the PIDs as proposed. Additionally, FFBF encourages the Agency to re-evaluate these PIDs to be based on the most scientifically-sound principles and to consider the mitigations and stringent standards Florida's producers already live by. FFBF is committed to working alongside the Agency to develop a more science-based and feasible decision.

We greatly appreciate your time and consideration on this matter.

Sincerely,

Jeb S. Smith
President
Florida Farm Bureau Federation