



March 31, 2022

Public Policy Board
American Phytopathological Society

Marisa Wright
US EPA Headquarters
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

RE: Request to extend the comment period for the proposed interim decision for ferbam (EPA-HQ-OPP-2015-0567), ziram (EQP-HQ-OPP-2015-0568) and thiram (EPA-HQ-OPP-2015-0433)

Dear Ms. Wright:

The American Phytopathological Society (APS) is the premier society dedicated to high-quality, innovative plant pathology research. The ~4,500 members of APS represent a broad range of specialties and come from academia, government, industry, and private practice. The APS Public Policy Board provides scientific input to the public-policy-making process.

On behalf of the Public Policy Board of the American Phytopathological Society, **we are requesting an extension on the timeline to submit comments on EPA's preliminary interim decision regarding the fungicide active ingredients ferbam, thiram, and ziram.**

These fungicide active ingredients are crucial for production of a diversity of crops such as almonds, blueberries, citrus, tree fruits, and many vegetables. Thiram is used extensively as a seed treatment for a diverse array of vegetable crops to limit the risk of seed transmission of many seedborne pathogens of these crops, including pathogens that have quarantine status in some states and countries. The broad modes of action of thiram, and the reduced risk of pathogen populations developing resistance to thiram, have made it a critical tool for managing seedborne pathogens for which there is a high risk of resistance to fungicides with site-specific modes of action, including other fungicides that are used as seed treatments. Given the global nature of seed production and dissemination, loss of thiram as a seed treatment option will significantly increase the risk of introducing new pathogens or new strains of seedborne pathogens into states or countries where the seed ultimately is planted, and greatly increase the selection pressure for development of resistance of these pathogens to fungicides with site-specific modes of action. It is important that affected stakeholders have the time needed to provide meaningful comments. Growers currently are facing multiple challenges with fungicides, which include supply chain issues, fungal pathogen resistance to site-specific fungicides, and limited effective fungicide options for management of new and emerging diseases. Ferbam, thiram, and ziram are fungicides with multi-site activity against fungal plant pathogens, which are a low-risk group regarding the development of fungicide resistance. In addition, these fungicides are important to producers of many low-acreage and niche, high-value market crops who may have limited options for management of important yield- and quality-limiting diseases.

We value the work the EPA does in evaluating the risk of fungicides to humans, animals, and the environment. Providing sufficient time for stakeholders to comment on important policy decisions is an essential component of effective risk evaluation. Extending the period in which stakeholders can collate relevant data and provide substantive comments will allow for a more comprehensive evaluation. An extension will also allow for additional risk assessments based on the recently updated methods.

Sincerely,

A handwritten signature in black ink that reads "Carl A. Bradley". The signature is written in a cursive style with a prominent loop at the end of the last name.

Carl A. Bradley, PhD.

On behalf of the Public Policy Board of the American Phytopathological Society