



March 31, 2022

Public Policy Board
American Phytopathological Society

Rachel Fletcher
US EPA Headquarters
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

RE: Request to extend the comment period for the proposed interim decision for iprodione (EPA-HQ-OPP-2012-0392)

Dear Ms. Fletcher:

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 ingredient iprodione.**

Iprodione is important for management of turf and ornamental plants and production of many other diverse crops such as almonds, beans, grapes, peanuts, and vegetables. Iprodione 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. Given the global nature of seed production and dissemination, loss of this fungicide as a seed treatment 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. It is crucial that affected stakeholders have the time needed for thorough review and to provide meaningful comments to the EPA. 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. In some cases, iprodione is important to producers of many low-acreage but high-value and niche market crops who may have limited alternative 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 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 initial "C" and a long, sweeping tail.

Carl A. Bradley, PhD.

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