NATIONAL POTATO COUNCIL
50 F Street, NW, Suite 900
Washington, DC 20001
(202) 682-9456 phone
www.nationalpotatocouncil.org

Via Electronic Docket Submission http://www.regulations.gov

January 17, 2024

Mr. Timothy Kiely
Acting Director
Pesticide Re-evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

Re: **Comments of the National Potato Council Regarding the Proposed Interim Registration Review Decision for Chlorothalonil, Docket Identification Number EPA-HQ-OPP-2011-0840.**

Dear Mr. Kiely:

The grower members of the National Potato Council (NPC) and the listed affiliated organizations are responsible for the production of more than 95 percent of the potatoes grown in the United States. The economic contribution to the U.S. of that production is more than $10.8 billion dollars at farm gate. Further processing, distribution, domestic and international sales and related activities increase that economic contribution to the U.S. economy by $100. 9 billion annually, supporting over 714,000 domestic jobs. These comments concern the Proposed Interim Decision (PID) for Chlorothalonil.

We appreciate the Agency's consideration of our comment period extension request and providing stakeholders with a 30-day extension to further understand the potential benefits and impacts associated with the Chlorothalonil PID, a chemistry critical to many potato growers in managing a variety of many fungi that can devastate potato fields.

Chlorothalonil is used in potato production to control Brown Spot (*Alternaria alternata*), Early Blight (*Alternaria solani*), Tan Rot (*Botrytis cinerea*), Black Dot (*Colletotrichum coccodes*) and Late Blight (*Phytophthora infestans*). These fungal diseases are primarily spread by air-borne spores and require maintaining a protective cover on the foliage of the entire potato field to prevent infestation of the field.

Once a field is infested with a disease like Late Blight, the only control to prevent further spread is to desiccate the area of the field and not harvest the potatoes. As a result, management practices must be able to ensure full protection of all the potato plant's foliage during times of high risk.

Host volunteer plants can exist in nearby fields that were planted to potatoes the prior year and where the pest are not being managed. Many farm operation's Integrated Pest Management plans include scouting old potato fields looking for volunteer plants to eliminate host materials.

Today's comments are built on our comments submitted to the Agency in conjunction with the Draft Human Risk Assessment for Registration Review of Chlorothalonil (dated Sept. 21, 2021. In those comments, we included data from eleven states on the use of Chlorothalonil and stated that, **"We are concerned with the agency's use of maximum annual application rates in modeling to predict environmental and human risk. The following examples are of actual application schedules provided by grower across the country. These examples demonstrate that chlorothalonil is rarely used at full label rates but rather as a part of a mixed application of products to control disease. However, there are also examples where the full rate was required due to market availability and disease pressure issues."**

Today's comments focus on ten key areas identified in the PID. In developing our comments, we requested data from potato growers across the country to understand the potential impact of these proposed label changes to their operations. The responses included growers from more than 20 states representing over 115,000 potato acres.

1. Impacts of Annual Maximum Application Rate Reduction for Crops on Vulnerable and Non-Vulnerable Soils

EPA is proposing rate reductions to reduce the amount of chlorothalonil potentially entering drinking water, thus reducing estimated dietary exposure and risk in vulnerable soils. "Vulnerable soils" are defined by the Agency as sandy or coarse-textured soils with less than 2% organic matter content and occur where the water table is 30 feet or less from the surface. All other soils are designated as "non-vulnerable."

Specifically, the Agency found that limiting the maximum allowed annual application rate on vulnerable soils to 6.5 lb a.i./acre/year is most likely to impact tart cherry, potatoes, and carrot production in the upper Midwest, tomatoes in the Southeast, and cranberries in the Northeast. Potential impacts include yield and quality losses from reductions in disease management and increased risk of fungicide resistance if growers needed to use more single-site fungicides to maintain disease control.

The Agency is correct in their assumption that reductions of the label rate (both for Vulnerable and non-Vulnerable Soils) would result in economic losses due to reduced yield and quality losses along with needing to make multiple applications of more expensive single-site products. Further, the reductions would lower the potato growers' ability to manage these diseases and result in increased risk of fungicide resistance as growers will need to use more single-site fungicides to maintain disease control.

Identified Concerns Related to Annual Rate Reductions:

1. **Chlorothalonil is a critical tool for potato producers across the country as a part of their Integrated Pest Management Program. While the proposed rate reductions on both vulnerable and non-vulnerable soils (as defined by the Agency), there is great concern that reductions to other key management tools – primarily mancozeb – will result in an increased reliance on Chlorothalonil as they are the only multi-site protectants available.**
2. **Limiting the annual maximum rate for Chlorothalonil will increase costs (in some cases by 300%), reduce efficacy and increase the risk of pathogens developing resistance to other tools.**

Our survey data suggests that 36-percent of the U.S potato acres would be within vulnerable soils. This includes fields in Indiana, Colorado, Georgia, Idaho, Indiana, Kansas, Michigan, Nebraska, New Mexico, Oklahoma, Oregon, South Carolina, Texas, and Wisconsin.

Potato growers producing on what would be classified as vulnerable soils were asked, "how will a reduction to 6.5 lb/a.i./acre annually impact your management strategy?". The following is a summary of their responses:

a. Many growers indicated that they can work with 6.5 lb/a.i./acre AS LONG AS we still have EBDCs (mancozeb). The use of mancozeb at the maximum label rate is an important part of our Integrated Pest Management strategy. Eliminating the use of mancozeb at its maximum label rate, would require growers to have to rely on more expensive products such as fluazinam and single-site protectants such as oxathiapiprolin.
b. The use of mancozeb at its maximum label rate allows for a lower rate of chlorothalonil at lower rates in the control of late blight throughout the season.
c. Annual rates are currently as low as 4-5 lb/ai/acre provided that late blight does not occur. Flexibility in use during the years when late blight is present above the 6.5 lb/a.i./acre would be necessary.
d. The climate in our growing region (Wisconsin) is highly conducive to fungal disease. Unlike some other regions, we need to protect the crop with weekly applications of products capable of successfully keeping these diseases at bay. To safeguard against creating resistance we desperately need several fungicide products with differing chemistries and modes of action as with any herbicides or insecticides. We don't have enough different products as it is, so any reduction in product or amount puts us at risk. Unless extreme weather events force our hand, we use less than maximum rates whenever possible, but we need that potential high rate when pest conditions warrant it. By reducing the amount of Chlorothalonil, we will be forced to use less effective, more expensive products at a higher rate and greater frequency to hopefully achieve the same level of crop protection but will likely be less effective overall.
e. We would have to reduce our applications at the full rate to under 6 times/year. Quite a few other products used in our IPM plan require that a protectant is used. Chlorothalonil is the best product available to meet that requirement to satisfy the label and our IPM goals.
f. It would negatively impact our pest management strategy by reducing application rates/ timing. This could increase the possibility of increasing diseases and lower quality and yields.
g. Impact depends upon cost and availability of other products, and disease pressure.

For non-Vulnerable soils the Agency has proposed reductions in maximum annual application rates from 11.25 lbs ai/acre to 8.0 lbs ai/acre. The following is a summary of responses to the question "How will a reduction to 8.0 lb/a.i./acre annually on non-vulnerable soils impact your management strategy?"

a. 75% of our acres are "non-vulnerable." 8 lb/a.i./acre is easy to work with AS LONG AS we can use the current allowable rate of mancozeb (11.2 lbs/a.i./acre per year).
b. A reduction to 8 lb/ai/acre would severely impact potato production. Chlorothalonil represents the base level of foliar disease control. Leaf spots such as brown leaf spot (BLS) and early blight (EB) are chronic and can be severe on highly susceptible French fry processing potato varieties and in some chip process potatoes. Fungicide resistance has already appeared in the BLS and EB fungal populations to anilinopyrimidine, succinate dehydrogenase, demethylation inhibitor, and

quinone-outside inhibitor fungicides due to their single site mode of actions. While the frequency of this resistance in some cases is low that would certainly increase if we lost valuable fungicide resistance management tools such as chlorothalonil and its multi-site mode of actions.

c. Late blight is still a significant problem in the Northeast requiring disease forecasting for severity values and often weekly preventative applications. I believe the loss of chlorothalonil threatens the potato supply in Maine.
d. On my farm in Washington state's arid climate, we typically do one application of chlorothalonil at 0.75 lbs/a.i./acre then another at 1. lbs/a.i./acre so we are only using about 1.75 lbs/a.i./acre.
e. The climate in our growing region (Wisconsin) is highly conducive to fungal disease. Unlike some other regions, we need to protect the crop with weekly applications of products capable of successfully keeping these diseases at bay. To safeguard against creating resistance we desperately need several fungicide products with differing chemistries and modes of action as with any herbicides or insecticides. We don't have enough different products as it is, so any reduction in product or amount puts us at risk. Unless extreme weather events force our hand, we use less than maximum rates whenever possible but we need that potential when needed. By reducing the amount of Chlorothalonil, we will be forced to use less effective, more expensive products at a higher rate and frequency to hopefully achieve the same level of crop protection but will likely be less effective overall.
f. It will create the need to shift to alternative protectants and more expensive specialty fungicides.

The following is a summary of responses that were provided for the use of chlorothalonil on both vulnerable and non-vulnerable soils to the question, "What products will you likely use as an alternative? Describe the cost and efficacy differences you would experience with this change."

a. Alternative products in our management strategy for chlorothalonil include Mancozeb (EBDC) which has a similar cost as chlorothalonil. Other, more costly products would include Syngenta's Omega (fluazinam) which is three to four times more expensive and Syngenta's Orondis Gold (oxathiapiprolin) is five times more expensive.
b. I would use a product like Corteva's DuPont™ Tanos® (active ingredients famoxadone and cymoxanil) which would go from $9 per application to over $30 per application, more than 300% increase in product costs.
c. Because chlorothalonil is a broad-spectrum multi-site mode of action fungicide, there is only one direct comparison and that is mancozeb. Unfortunately, while it is also a broad-spectrum fungicide with multiple sites of action, it is not as efficacious, largely due to the ease with which it can be washed off the plant canopy. The cost of mancozeb is comparable to chlorothalonil. In the absence of being able to use broad spectrum products, and the need to apply frequent fungicide applications to achieve adequate control, the only other choices are single site modes of action fungicides in a.i. chemical classes such as anilinopyrimidine, succinate dehydrogenase, demethylation inhibitor, and quinone-outside inhibitor fungicides. These fungicides are substantially more expensive, varying from 2.5X to nearly 4X the cost depending on how recently the fungicide was registered.
d. Mancozeb is the only other option that serves the same purpose. If I had to only use products that were not protectants (i.e. chlorothalonil or mancozeb), I would be creating greater selection pressure for fungicide-resistant pathogens.

e. I would look to the following products as a replacement for chlorothalonil: mancozeb, Syngenta's Quadris (azoxystrobin), Bayer Crop Sciences Luna Tranquility (fluppyram and pyrimethanil), BASF's Priaxor (fluxapyroxad and pyraclostrobin), and BASF's Headline (pyraclostrobin).
f. I would look at mancozeb, Syngenta's Miravis Prime (fludioxonil and pydiflumetofen), Syngenta's Revus Top (mandipropamid and difenoconazole), and Syngenta's Orondis Gold (oxathiapiprolin).
g. Alternate groups of fungicide not with the same AI would probably increase costs to maintain protective cover.
h. Alternative products would include mancozeb which has a similar cost but is less effective or Loveland's Polyram (metiram) which has lower efficacy.
i. Have not evaluated other product alternatives. Anticipate cost would likely be higher.

Resistance management needs to be a key consideration of the Agency as Integrated Pest Management strategies already include the rotation of chemistries used annually.

When growers were asked about the annual rate of chlorothalonil (vulnerable and non-vulnerable soils); "Would this change impact your resistance management strategy? if so, how?", the following responses were provided:

a. It would not, assuming mancozeb is still allowed. If we also lose mancozeb then resistance risk will be crazy high. Chlorothalonil and mancozeb are the only potato fungicides we use that have so many sites of action that resistance has not developed in 30+ years.
b. One less thing to rotate with so it would increase the chance of resistance.
c. Leaf spots such as brown leaf spot (BLS) and early blight (EB) are chronic and can be severe on highly susceptible French fry processing potato varieties and in some chip process potatoes. Fungicide resistance has already appeared in the BLS and EB fungal populations to anilinopyrimidine, succinate dehydrogenase, demethylation inhibitor, and quinone-outside inhibitor fungicides due to their single site mode of actions. While the frequency of this resistance in some cases is low, resistance frequencies would certainly increase if we lose valuable a.i. of fungicide resistance management tools such as chlorothalonil and its multi-site mode of actions.
d. Yes, reducing chlorothalonil usage is a significant detriment to resistance management. Without chlorothalonil, I will be forced to rely on single-site mode of action products which have already been shown to select for pathogen resistance. There has never been a confirmed case of resistance to chlorothalonil due to its broad spectrum of activity.
e. A stricter resistance management strategy would need to be followed with the other classes of chemistry and development of resistance is a much bigger concern than the chlorothalonil products.
f. Yes, without Chlorothalonil, the number of tools is reduced, and the other products are less effective and more expensive.
g. It will reduce the amount of a broad-spectrum protectant with multi-site activity we can use.
h. It would result in us having to do our fungicide plan and incorporate alternate chemical groups, many with reduce efficacy and higher cost.
i. Would require the use of different materials which would not be as effective and increased cost.

2. Proposed Label Mitigation: Buffers to All Aquatic Areas

The Agency is proposing extending buffers to all aquatic areas. Buffers are currently only required for estuarine/marine habitats. This proposal extends buffers to freshwater habitats. These restrictions are expected to help mitigate aquatic risks from spray drift and runoff. The following label language is proposed under Use Restrictions:

"This product must not be applied within 150 feet (for aerial and airblast applications) or 25 feet (for ground applications) of water bodies (estuarine/marine and freshwater) unless there is an untreated buffer area of that width between the area to be treated and the water body."

The Agency expects impacts from this proposed requirement. Imposing buffer zones adjacent to freshwater habitats would likely result in affected users switching to alternate fungicides if the treatment use area falls within the established buffer area. Disease management practices specific to each use site could also be impacted in such instances where additional fungicide applications could be necessary. Additional fungicide applications also impose additional labor costs on users. Therefore, buffers adjacent to aquatic areas are anticipated to cause substantial localized impacts in terms of disease management practices, resistance management, and potential economic costs to current chlorothalonil users in use sites with or next to surface water bodies, where smaller acreage use sites are expected to be more impacted than those with large footprints, as a larger share of the total productive area may be affected by a buffer.

We agree with the Agency in their expected impacts from this proposed requirement.

Identified Concerns Related to Proposed Label Mitigation: Buffers to All Aquatic Areas:

1. **These buffers will result in the loss of productive farmland as the use of Chlorothalonil and other crop protectants requires treatment of all potato foliage. Growers indicated it could result in a reduction of 10% of their tillable acreage being needed to create the necessary buffer area that would need to be taken out of production to ensure protection.**
2. **The specific impact will be on a field-by-field basis with the largest impacts being on smaller fields.**
3. **What specifically being defined as an Aquatic Area is unclear and must be further defined.**

When growers were asked "How would this buffer impact your operation as it relates to disease management, resistance management, number of alternate fungicide applications, and labor/production costs?" the following is a summary of their responses.

a. One grower anticipated that it would result in a loss of at least $40/acre, assuming that they could still plant all of the field and experienced no crop loss from disease. On their farmland in Michigan and Indiana (8,500 acres), it would require them to leave 10% of all rented/owned acres unplanted resulting in a lost revenue of $5,400,000 without a crop loss and upwards of $8,000,000 should they incur a crop loss resulting from reduced disease control.
b. Many of my fields have a ditch next to it so it would result in non-applied areas in the field.
c. The impact of these buffer zones is difficult to assess without knowing exactly what the EPA defines as a "water body". How large are we talking about? In the midwest due to pre-history glacier activity we have a lot of potholes, some of which can be several acres. If these are defined as a water body, buffer zones would negatively impact labor and production costs by

increasing them substantially and would negatively impact the application of chlorothalonil by virtually eliminating the use of aerial applications.

d. We would have to make multiple trips to the same field to treat the affected area differently to be in compliance. This would increase our labor, fuel, equipment and spraying costs. Limiting what products that can be used in those affected areas could create resistance problems as well by only being able to use a select few products (New York).
e. It would not allow us to use chlorothalonil on some of our acreage (Maine).

3. Proposed Label Mitigation: Soil Saturation Statement

The Agency identified runoff as a potential exposure route of concern for aquatic risks of chlorothalonil. In order to reduce the potential for surface water runoff and protect non-target organisms, EPA is proposing the following soil saturation statement for chlorothalonil products delivered via liquid spray or granules to crops that do not require production in flooded fields or streams:

"Do not apply when soil in the area to be treated is saturated (if there is standing water on the field or if water can be squeezed from soil)."

The Agency expects minor negative impacts from a prohibition on applying chlorothalonil when soils are saturated, as this would limit the available window users have to make time sensitive applications. Users may have to resort to an alternative fungicide without such saturated soil restrictions.

While we agree with the Agency that this mitigation will have minor negative impacts, it is important to note that the threat for fungal disease is greatest when the soil conditions are saturated. The need to apply chlorothalonil for late blight control is very time sensitive. There is often standing water in portions of sprayer rows during the growing season. Only in a prolonged event lasting 4 to 8 days depending on prior application would we consider going to an aerial application to protect the crop. If growers cannot apply during those times or have to use another product that is not as effective as Chlorothalonil, they could lose the whole crop.

4. Bulletins Live! Two Labeling

The Agency is proposing the following Bulletins language be added to all chlorothalonil product labels to implement the 2011 NMFS BiOp. This language instructs users to check the BLT website to understand listed species use restrictions that may apply to them, if available. In addition to facilitating implementation of the 2011 NMFS BiOp, including this language on product labels will help streamline implementation of any additional risk reduction measures that may be identified during any necessary ESA consultation.

Although the BLT system has been in place for many years, there may be grower applicators who are unfamiliar with this system. Using the online tool to determine if mitigation is required for a particular treatment area may be a new step that many users will need to take prior to an application. Requiring the use of BLT is likely to have initial impacts in the form of added complexity when planning and performing applications, which may hinder operational procedures and increase training requirements, resulting in potential reduction in productivity and a rise in production costs. However, the Agency anticipates that over time and with wider implementation, BLT will become a familiar tool that is integrated into a user's planning process for pesticide applications. In February 2022, EPA released an

improved version of BLT63, which allows users to more easily find the information they need for a particular pesticide product. The Agency has also developed a tutorial that explains how to use the online system. In addition, the general label language referring users to BLT provides a phone number and email address for those needing technical assistance.

Growers have raised concerns about the complexity, additional stress and overhead costs that this will require in production management. It is apparent that most of those involved in pesticide applications would need to be trained on getting familiar with BLT.

It is important for the Agency to understand that growers typically order their crop protectants as early as 12-18 months before use due to the current supply chain market. It would be helpful to know if there are local use restrictions before we purchase the chemicals. Clearly utilization of Bulletins Live! Two, will not provide growers with accurate information related to the products they intend to purchase that far in advance. If that decision needs to happen earlier than the 6-month window, there could be a surprise later that year if the BLT will not allow the application and you have the product on hand or if the BLT allows the application but you can no longer get the desired product.

5. Spray Drift Mitigation

The Agency is proposing label changes to reduce the potential for off-target spray drift and establish a baseline level of protection against spray drift that is consistent across all chlorothalonil products.

The Agency is proposing spray drift mitigation language to be included on all chlorothalonil product labels for products applied by liquid spray application. The proposed spray drift language is intended to be mandatory, enforceable statements and supersede any existing language already on product labels (either advisory or mandatory) covering the same topics.

In general, it appears that these mitigations are reasonable. The main concern identified is related to requiring a larger droplet size and the potential reduced coverage of foliage as the product is not systemic.

6. Droplet Size

The Agency is proposing a restriction on droplet size because coarser droplets have been demonstrated to decrease spray drift and, therefore, reduce potential risks to non-target species. Even though a medium droplet size has shown to deposit efficiently and provide good coverage on stems and narrow vertical leaves as required by a protectant fungicide such as chlorothalonil, EPA does not know the effect this requirement will have on the performance of chlorothalonil across various use patterns. In general, potential negative impacts to growers from requiring larger droplets could include reductions in efficacy, increased selection pressure for the evolution of fungicide resistance due to a decrease in lethal dose delivered to target fungi, increased application rates used by growers, increased costs associated with reduced yield, more fungicide applications, purchase of alternative products, or an inability to use tank mix or premix products.

We agree with the identified risk identified by the Agency related to requiring larger droplet sizes. Specifically, growers indicated the following concerns:

- **Increased droplet size will reduce the efficacy of the product by covering less of the plant when applied.**

- **There is no question that larger droplet sizes will negatively impact the efficacy of protectant fungicides such as chlorothalonil. Adequate distribution of a non-systemic fungicide such as chlorothalonil is key to achieving disease control and that cannot be achieved with larger droplet sizes. Growers are responsible in having both aerial and ground rigs tested to insure we are delivering pesticides in a manner that will allow optimized control. This process is critical for optimizing fungicide applications to obtain maximum disease control. When aerial or ground applicators change nozzle configurations to minimize drift and increase droplet sizes it is easy to observe a decrease in foliar disease control in the field after only a few weeks.**
- **It will cost us more money in requiring more fungicide, if the label may be reduced this is further detrimental. It is more product that needs to be handled and loaded in the sprayer, as well as more applied to the environment.**
- **All the potential concerns listed above are real. When applying protectants, coverage is everything since it is not a systemic product. Reducing coverage not only puts chlorothalonil at risk but also the other products in the tank mix that require a protectant to be added according to the label. This could create an efficacy and resistance issue that will increase costs to the grower.**

7. Prohibiting Applications During Inversions

The Agency is proposing to prohibit applications during inversions. They noted this could result in delays to intended applications and, more generally, reduce the amount of time users have to apply chlorothalonil. Management of production activities would be more complex.

We agree with the concerns identified by the Agency. Growers specifically noted the following concerns:

- **Would be very difficult because the prime time to spray to minimize drift risk and chemical phytotoxicity is early morning when it's calm and there are some pockets of inversion.**
- **This could be a problem because at times, applications are very time-sensitive and delaying applications could have detrimental effects.**
- **Farmers have limited windows to apply products safely. More restrictions will make it harder to do a timely job of spraying which will negatively affect the IPM plan of the farm. This will increase costs and decrease yields.**
- **We are not able to recognize an inversion exists until after it has happened.**

8. Wind-directional Drift Buffers for Conservation Areas

The Agency has identified risks of concern around terrestrial organisms such as birds, mammals, reptiles, terrestrial-phase amphibians and potentially for terrestrial invertebrates from applications of chlorothalonil. In order to reduce risks to organisms that reside in conservation areas, the Agency is proposing spray drift buffers between the edge of the field and conservation areas (e.g., public lands and parks, national and state wilderness areas and wildlife refuges, national and state forests, and national and state grasslands).

Growers identified several concerns they are expected to experience in maintaining the described buffers next to conservation lands. These concerns included:

- **We are reliant on aerial applications. About 3-7% of our acres would be affected. We would have to use a ground rig, which increases the risk of rot and greening. We would anticipate an additional cost of $250,000 annually to meet this requirement.**
- **The impact for growers that use ground applications for pesticide applications will not be affected substantially. However, there is no question that there will be fields in some areas of the USA where aerial applications of chlorothalonil will be virtually eliminated which means a substantially more expensive single site mode of action fungicide would need to be used thereby increasing production costs while also increasing the risk of fungicide resistance development.**
- **We have small irregular shaped fields, surrounded by many of the buffers explained. If we had to take acres out of production, it would be detrimental and there is no other acreage to purchase. Manmade structures are not realistic in commercial farming to serve as windbreaks.**
- **We have a farm that is in the Adirondack Park Agency (Maine). This additional restriction would make it very difficult to achieve an efficacious treatment. We are seed growers so quality is everything and this could jeopardize that.**

9. Endangered Species: Proposed Risk Mitigation to Implement the 2011 NMFS Salmonid BiOp for Conventional Uses

The Agency proposes that applications of chlorothalonil may not be made to saturated soil, or if NOAA/National Weather Service predicts a total rainfall of 1 inch or greater over the 48 hours following the day of application, only considering a 48-hour period when, at any point during the 48-hour period, the precipitation potential is 50% or greater following application in or near salmonid habitat. EPA proposes that the 48-hour rain restriction for chlorothalonil be implemented on a geographic-specific basis in Bulletins.

The 48-hour rain restriction near designated salmonid critical habitats in California, Idaho, Oregon, and Washington, required as part of the mitigation measures presented in the 2011 Biological Opinion issued by the NMFS, may have high impacts on growers near salmonid habitats (i.e., within 1000 feet of certain water bodies) that require a chlorothalonil application. Potato, tomato, celery, onion, and cabbage growers in those areas that require time-sensitive applications to ensure protection from disease ahead of a rain event may have to resort to an alternative chemistry or combination of chemistries that are more expensive.

Responses from growers inside the identified area were limited. Growers did comment that it would rarely impact the western US potato production areas as rainfalls that saturate the soils are uncommon (although 2023 in CA was an extreme exception). However, growers in that area would likely not be applying chlorothalonil unless rain is forecasted, to provide protection.

10. Tolerance Actions

The Agency plans to exercise its FFDCA authority to update the tolerance expression to appropriately cover the metabolites and degradates of chlorothalonil and to specify the residues to be measured for each commodity for enforcement purposes. To reflect current Agency policy, EPA anticipates amending the tolerance expression to read as follows:

The Agency also proposes certain tolerance revisions are necessary to harmonize with Codex, align with the current rounding class practice, update crop groups, and revise commodity definitions.

As we noted in our comments associated with the Draft Human Health Risk Assessment for Registration Review (dated Sept. 20, 2021), we support EPA's efforts to harmonize pesticide tolerances with CODEX wherever possible. We believe it is important to recognize that the proposed alignment with CODEX for residues in potatoes, from 0.1 ppm to 0.3 ppm may be perceived to create a trade barrier with Canada, the fact that maximum application rates are not changing should not result in increased residue.

Again, we appreciate the opportunity to provide these comments to the Agency on the Proposed Interim Registration Review Decision on Chlorothalonil. We believe it is essential for the agency to ensure the future availability of chlorothalonil remains an economical tool in potato production in the United States. We believe the real-world information from the environmentally conscious producers on the actual use of Chlorothalonil and the other fungicides used to protect the U.S. potato crop needs to be included in the Agency's decision to ensure that their decisions do not provide a negative economic impact on producers or provide a pathway for the development of resistance to any of the pest management tools used by any of the pathogens that are detrimental to the industry.

Sincerely,

Michael R. Wenkel
Chief Operating Officer
National Potato Council

Joining affiliated organizations:

Colorado Potato Administrative Committee
Empire State Potato Growers
Idaho Potato Commission
Maine Potato Board
Minnesota Area II Potato Council
Northland Potato Growers
North Carolina Potato Association
Oregon Potato Commission
Pennsylvania Cooperative Potato Growers
Potato Growers of Michigan
United Potato Growers of America
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association