

**Via Electronic Docket Submission** <http://www.regulations.gov>

July 1, 2024

Anne Overstreet  
Director, Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

**Re: Docket EPA-HQ-OPP-2015-0568**

Comment of the U.S. Apple Association Regarding the amended Proposed Interim Decision (PID) for Ziram.

Dear Ms. Overstreet:

On April 30, 2024, the Environmental Protection Agency (EPA or Agency) published a notice in the Federal Register announcing the availability of the amended PID for Ziram for public comment. 89 Fed. Reg. 34241-2. The U.S. Apple Association (USApple) writes today to offer these comments on the Ziram PID.

USApple is the national trade association representing all segments of the apple industry. Members include 36 state and regional apple associations, representing 26,000 apple growers throughout the country and more than 3,700 apple-related companies. Our members collectively grow more than 10 billion pounds of apples a year on average, supporting 150,000 jobs and generating more than \$8 billion in total wages and almost \$23 billion in economic activity.

Fungicides are an incredibly valuable tool for all apple growers, especially midwestern and eastern growing regions where climates include warm and wet summers. Ziram is one of the few effective multi-site fungicides available to treat apple scab, bitter rot, and various other rots and molds. It is a highly important and widely used fungicide for apple growers. Removing the use of Ziram for apples would be detrimental for apple growers as there are limited alternatives available and registering new fungicides for apple production is not a priority for most chemical companies due to the registration costs. Growers have stated that without Ziram, they will be forced to use multiple single site fungicides. This means they will have to use one fungicide per disease, rather than one that protects against multiple diseases, thus increasing their production costs and the risk of resistance build up.

In today's market, most apple growers are losing money. It is estimated that an average apple orchard in Michigan is losing \$2,300 per acre this year. This number will only increase with the loss of Ziram and will make midwestern and eastern growers even less competitive. Eastern apple growers face heavy disease pressure and must use fungicides every season to prevent widespread disease



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outbreaks. The dryer climate in the western production region allows apple growers to use less fungicides due to the decreased risk of apple scab and other diseases.

As previously stated in our letter of May 18, 2022 to the Agency, other implications include significantly less fruit qualifying as “fresh” and a considerably lower amount of fruit surviving storage without significant quality degradation. The price of apples in the processing market is about one-third of apples in the fresh market, meaning that the loss of Ziram will directly contribute to significant economic loss in the apple industry.

It is also important to note that the current highest Ziram label rate is not representative of actual usage in apple orchards.

In the Pacific Northwest, Ziram is typically applied twice a year- once at petal fall to control apple scab and bitter rot and once pre-harvest to control post-harvest rots. In the midwest and eastern United States, apple growers can reach the legal limit of seven applications per crop cycle if conditions are conducive for diseases.

However, the rate and number of applications tend to be far below the highest use limit as Ziram is typically used near the end of the growing season or in rotation with Captan. It is often the preferred broad-spectrum fungicide applied at the end of the season as it has a relatively short preharvest interval and its impact to fruit finish is less than its alternatives.

As growing seasons continue to lengthen, it is important that growers continue to have access to the tools needed to supply a safe and healthy product to consumers. Taking away grower tools with no new cost-efficient replacements available severely restricts the ability to meet high consumer standards for a healthy product at an affordable price.

We strongly encourage EPA to reconsider and revise its proposed decision and address occupational risks by updating the label to reflect the number of typical applications, typical pounds of active ingredient applied per acre and through mitigation options, including a slight extension to the restricted-entry interval and changes to required personal protective equipment.

USApple members remain committed to the safe handling and application of pesticides and continue to work with extension agents and specialists in creating the safest and most effective disease management program. USApple has consistently supported a science-based regulatory approach to crop protection chemical usage and is glad to provide the EPA with any additional data or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitchell Liwanag".

Mitchell Liwanag  
Manager, Environmental Affairs