September X, 2024

**Please edit the text below as you see fit.**

Jean Overstreet (overstreet.anne@epa.gov)

Director, Pesticide Re-evaluation Division

Office of Pesticide Programs, Environmental Protection Agency

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AND/OR Ben Tweed, Chemical Review Manager (tweed.benjamin@epa.gov)

I am writing regarding the registration review for mancozeb (Docket EPA-HQ-OPP-2015-0291 and supporting document EPA-HQ-OPP-2015-0291-0094). **As a (grape grower, extension agent, etc.) in STATE, I believe that the needs of my industry have not been adequately assessed in the decision-making process for mancozeb.** High fungal disease pressure demands the frequent use of fungicides, and mancozeb is a cost-effective part of our disease management programs.

Mancozeb is a key component to integrated disease management for **Phomopsis and downy mildew.** We typically only use mancozeb until just before bloom because strong early season disease control prevents economically devastating disease for the entire season. Mancozeb plays a critically important role in **downy mildew resistance management.** Pathogen resistance to strobilurin (FRAC11), CAA (FRAC40) and phosphorous acid oomycides are common in vineyards. The loss of this multi-site fungicide will only speed up the breakdown of our few remaining single-site chemistries for downy mildew control. This will interfere with all resistance management practices, leading to higher pathogen pressure and higher rates of fungicide application broadly. Additionally, mancozeb is the **ONLY** chemistry registered to protect grapevines from Phomopsis, a fungal disease that can weaken rachises and cause severe crop loss at harvest.

We recognize and appreciate the EPA’s intent to protect workers from the hazards of post-application exposure to mancozeb. The EPA has identified post-application exposure risks via tying/training, hand harvesting and manual leaf pulling for up to 45 days after a single mancozeb application at maximum rate (3.21b Al/ac). **However, these activities often occur MORE than 45 days AFTER our last typical mancozeb spray (pre-bloom).** Many growers in our industry have made great strides towards mechanizing some of these practices, which would drastically reduce human exposure for these activities. There are also many growers who farm grape varieties such as Concord, Niagara and hybrid cultivars that do not require any canopy manipulation at all, but would still lose the ability to use mancozeb based on this proposal. In addition, while not ideal, **we could accommodate the proposed four-day restricted re-entry interval.** Removing mancozeb from our repository of registered chemistries will result in immediate loss of productivity and crop yield, creating cascading economic impacts through the grape industry and threatening the livelihood of thousands of producers. Winemakers and other grape processors will be forced to seek imported grapes, and an entire stable industry, which contributes an estimated **$276 billion to the U.S. economy,** would be at risk of collapse.

**I respectfully request that you reconsider the impacts of your proposed decision and include grapes among the other commodities that will retain mancozeb usage through increased mitigation measures and label updates. DO NOT cancel the use of mancozeb on grapes.**

Sincerely,

[Your signature]

[Your typed name]

[Your phone number and/or email address]