

Congress of the United States
Washington, DC 20515

May 19, 2022

Dr. Mary Elissa Reaves, Director of Pesticide Re-evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
Regulatory Public Docket EPA-HQ-OPP-2015-0433
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Dr. Reaves,

We write to convey the critical importance of including strawberries in re-establishing the registration of Thiram and urge the Environmental Protection Agency (EPA) to examine recently released and pertinent data from Taminco US LLC before producing a Final Registration Review Decision.

For more than 100 years, the Florida strawberry industry has been an essential contributor to the state's economic strength. The farm-gate value of Florida strawberries is approximately \$400 million and the net economic contribution of the industry is estimated at \$1 billion¹. Florida produces more than three-quarters of the nation's strawberries during the winter months, ensuring a steady supply of the fruit across the country year-round. Additionally, the Florida strawberry industry creates over 15,000 jobs in the state.

The safe usage of Thiram has been well-documented over the past 50 years and the EPA has stated previously that application of the fungicide poses a low risk to applicators when applied through overhead sprayers. Citing a new *in vitro* dermal absorption study with human skin using Thiram SC conducted by Taminco US LLC, the Dermal Absorption Factor (DAF) for Thiram used for bystander, occupational handler, and occupational post-application was found to be 1.2%². This figure is significantly lower than the 15% DAF found within the Proposed Interim Registration Review Decision (PID) and is acceptable with MOE above the relevant Level of Concern. Given this knowledge, we request the EPA to reassess data recently released pertaining to handler and bystander safety before making any Final Registration Review Decision.

The removal of strawberries from the Thiram registration will subject Florida's strawberry industry to debilitating crop fungal diseases like botrytis and neopestalotiopsis, reduce volume of yield, and pose disastrous economic consequences. In light of recent rising production costs due to labor price increases, Florida's strawberry growers are not equipped to financially bear the repercussions placed upon them should the EPA finalize this decision.

¹ <https://edis.ifas.ufl.edu/publication/FE972>

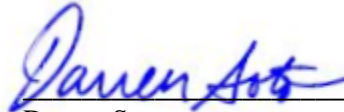
² Piccirillo, Ph D., Vincent J. VPTOX, LLC, Ashburn, VA, 2022, *Thiram Task Force Comments on the Proposed Interim Registration Review Decision for Thiram*.

While continual review by the EPA under jurisdiction of the Federal Insecticide, Fungicide, and Rodenticide Act is necessary in protecting the health and safety of the workforce, we implore newly developed data from Taminco US LLC to be reviewed before making any Final Registration Review Decision. The inclusion of strawberries in the registration of Thiram is essential to the mitigation of fungicide resistance and protects an industry worth over \$1 billion to the state of Florida.

Sincerely,



C. Scott Franklin
Member of Congress



Darren Soto
Member of Congress



Kat Cammack
Member of Congress



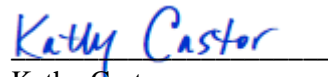
Al Lawson
Member of Congress




Maria Elvira Salazar
Member of Congress



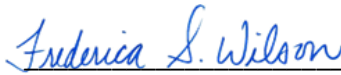
Mario Diaz-Balart
Member of Congress



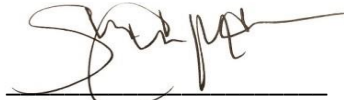
Kathy Castor
Member of Congress



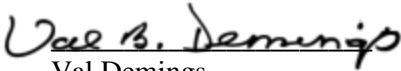
Bill Posey
Member of Congress



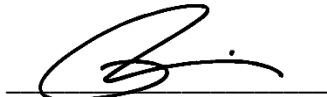
Frederica Wilson
Member of Congress



Sheila Cherfilus-McCormick
Member of Congress



Val Demings
Member of Congress



Brian Mast
Member of Congress