

Pesticide Information Request Response

Arid Southwest IPM Network

Arizona Pest Management Center

July 23, 2010

Data Request: Maneb Tolerance Revocation – Proposed Rule and Invitation for Public Comment

Docket #: EPA-HQ-OPP-2010-0327

Date of Request: May 26, 2010

Comments Due: July 26, 2010

Information Request: EPA is proposing to revoke all the tolerances for the fungicide maneb because the Agency has approved requests for voluntary cancellation by registrants of the last registrations for the food uses of maneb in the United States.

Process / Data Sources: Al Fournier of the Arizona Pest Management Center (APMC) reviewed Arizona pesticide use reporting database to generate statewide data on maneb use (1991-2009), and solicited additional input from Arizona IPM Specialists on current maneb use patterns in various crops. He forwarded the request to Arid Southwest IPM Network partners at New Mexico State University, University of California Cooperative Extension and University of Nevada Reno.

Most Important Finding

Currently, maneb remains a critically important active ingredient for disease control in the vegetable industry, particularly for lettuce production. **Mancozeb, the replacement for maneb, is not yet registered for use. The continued availability of maneb is crucial to the Arizona lettuce industry until mancozeb becomes registered for use.**

Response for Arizona

According to pesticide use reports, maneb continues to be an important disease management tool in several Arizona crops, particularly vegetable crops, including lettuce, cabbage, dry onions and potatoes (Table 1). Targeted plant pathogens and diseases include anthracnose, alternaria leaf spot, downy and powdery mildews, early and late blight, sclerotinia, rhizoctonia, and various rots and rusts. While use has declined somewhat in recent years (dropping from 82,000 acres treated in 2005 to 26,000 acres in 2009), maneb remains an important management tool in these crops, particularly in head lettuce. Mike Matheron, Extension Plant Pathologist and Professor with University of Arizona, indicates that maneb is an extremely useful and integral part of fungicide management programs for downy mildew on lettuce and other vegetable crops in Arizona. With a multi-site mode of action, this compound is a valuable resistance management tool when used in a downy mildew management program along with single-site mode of action chemistries. Mancozeb, the replacement for maneb, is not yet registered for use. The continued availability of maneb is crucial to the Arizona lettuce industry until mancozeb becomes registered for use.

Response for Nevada

According to Jay Davison, Area Forage and Alternative Crops Specialist for the University of Nevada Cooperative Extension, maneb is not used very much in commercial agriculture in Nevada, as very few vegetables are grown and most of the vegetable producers are small organic

operations. He suspects that the primary use would be by homeowners who might purchase a fungicide with maneb as an ingredient.

Response for New Mexico

Tess Grasswitz, Urban / Small Farms IPM Specialist with New Mexico State University contacted several pesticide distributors and informed them of EPA's plan to revoke tolerances for maneb. Several distributors indicated that they sell "quite a lot" of maneb, and one specifically indicated sales to aerial applicators.

Table 1: Arizona Maneb Use, Total Acres Applied by Crop, from AZ pesticide use reports, 2005 - 2009					
CROP	2005	2006	2007	2008	2009
BEANS, DRY					220.00
BROCCOLI	2733.74	574.49	425.96	1522.84	489.14
CABBAGE UNSPECIFIED	4023.10	553.02	759.09	1826.01	1265.04
CABBAGE, CHINESE (NAPA)		7.00			
CAULIFLOWER	517.85	120.10	252.20	388.09	192.77
CHILI PEPPERS	321.00	200.00			180.00
COTTON				68.40	
ENDIVE	36.15				
KALE	18.00				
LESQUERELLA				21.90	
LETTUCE, BUTTER			21.50		
LETTUCE, HEAD	69306.78	12765.10	9123.53	14258.17	11262.44
LETTUCE, LEAF		3509.44	2408.11	4597.54	4623.76
LETTUCE, ROMAINE		2970.00	2763.80	3924.14	3523.30
LETTUCE, UNSPECIFIED		813.40	363.00	679.14	799.80
ONION			65.00		
ONIONS, DRY	3127.60		109.50	287.26	2354.35
ONIONS, GREEN		185.90	179.50	43.70	8.00
PEANUTS	7.30				
POTATOES	1634.00		431.00		1159.00
SEED, BROCCOLI	186.50		9.00		
SEED, CABBAGE			8.50	144.10	121.60
SEED, CAULIFLOWER	2.00	20.00	31.00		
SEED, DRY ONION	164.00				
SQUASH, WINTER		17.00			
WHEAT				375.11	
TOTALS	82078.02	21735.45	16950.69	28136.40	26199.20

Response for California

Data on maneb use in Imperial and Riverside Counties of California during 2008 were extracted from the California Department of Pesticide Regulation online pesticide use reporting database at <http://calpip.cdpr.ca.gov/county.cfm>. This is the most recent data publicly available. These data, summarized in Table 2, indicate a significant amount of maneb usage on lettuce (head and leaf lettuces), onions and potatoes in Imperial and Riverside Counties in 2008.

Table 2: Maneb Use based on Pesticide Use Reports for Riverside and Imperial Counties, 2008

CROP	REPORTS	POUNDS_APPLIED	ACRES_TREATED
BERMUDAGRASS	1	115	73
BOK CHOY	7	18	16
BROCCOLI	19	860	654
CABBAGE	7	229	202
CHINESE CABBAGE	7	53	46
LETTUCE, HEAD	236	9349	7672
LETTUCE, LEAF	230	5730	4763
N-GRNHS GRWN TRNSPLNT/PRPGTV			
MTRL	26	19	26
ONION	83	8643	5495
POTATO	42	4223	3067