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Comments in response to **Pyraclostrobin (Case 2285)**;

Registration Review; Draft Human Health and/or Ecological Risk Assessments for Several Pesticides.

The following comments are being submitted in response to the September 30, 2019 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of Pyraclostrobin. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of Pyraclostrobin in the production root vegetable and tree nut crops, in Hawai'i. Pyraclostrobin is found in **Cabrio** and **Pristine** products.

Changing the PPE requirements for this product would significantly impact Hawai'i growers and workers. Requiring a respirator would 1.) require a doctor's clearance. 2.) Require employees to take a respirator fit test and 3.) Attend yearly training. All of these additional requirements are expensive for employers and employees. Adding a respirator would be cumbersome, time consuming and costly for workers, growers and employers.

Pristine fungicide is used in alfalfa, root vegetables and tree nut. The same PPE requirements would have the same impact for this product as well. This would negatively impact Hawai'i growers because organizations are a lot smaller, this would put restraints on smaller organizations, who may not have the funding or resources to add such additional training and requirements. In any event, there have been no documented effects to bee larvae.

Comments compiled and submitted by:



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