

MRID: 49957701

201600511

### TITLE

Petition for 3 Years Extension of Exclusive Data Use for Fluopicolide as Provided for Under FIFRA Section 3(c) (1) (F) (ii)

#### **TEST GUIDELINE**

None

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#### STUDY COMPLETION DATE

2016-11-04

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### LABORATORY PROJECT ID

VP-40085

#### **TOTAL PAGES**

32

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November 4, 2016

VP-40085

#### **GLP COMPLIANCE STATEMENT**

This study does not meet the Good Laboratory Practice standards set forth by the United States Environmental Protection Agency, Code of Federal Regulation Title 40 Part 160; and differs in the following way(s):

- No new data generated.

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#### **1.0** Introduction

Valent USA, hereby petitions EPA to extend by 3 years the period of exclusive data use for Fluopicolide fungicide by applying the provision of FIFRA Section 3(c) (1) (F) (ii).

FIFRA Section 3(c) (1) (F) (ii) states that:

The period of exclusive data use provided under clause (i) shall be extended 1 additional year for each 3 minor uses registered after the date of enactment of this clause and within 7 years of the commencement of the exclusive use period, up to a total of 3 additional years for all minor uses registered by the Administrator if the Administrator, in consultation with the Secretary of Agriculture, determines that, based on information provided by an applicant for registration or a registrant, that –

(I) there are insufficient efficacious alternative registered pesticides available for the use;

(II) the alternatives to the minor use pesticide pose greater risks to the environment or human health;

(III) the minor use pesticide plays or will play a significant part in managing pest resistance; or

(IV) the minor use pesticide plays or will play a significant part in an integrated pest management program.

#### Fluopicolide Registrations

Fluopicolide technical (EPA Reg. No. 59639-139) and the end-use products, V-10161 4 SC Fungicide (59639-140), V-10161 VPP (59639-141), V-10162 Premix (59639-142), and V-10162 VPP (59639-143) were first granted US registration on January 28, 2008.

Currently registered (as of January, 12, 2015) use patterns are:

Crop Group 1
. Crop Group 2
Crop Group 3
Crop Group 4
Crop Group 5
Crop Group 8
Crop Group 9

Outdoor Terrestrial Non-Food Uses On: Conifers and Deciduous Trees and Ornamental Plants Including: Bedding Plants, Conifers, Flowering Plants, Foliage Plants, Ground Covers, Non-Bearing Fruit Trees, Non-Bearing Nut Trees, Non-Bearing Vines, Ornamentals, Shrubs, Sod Farms, Tobacco and Turfgrass

Indoor Non-Residential Terrestrial Non-Food Uses On: Ornamental Plants in IndoorNurseries including Greenhouses, Shadehouses and Lathhouses. Uses forwhich USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

#### 2.0 Fluopicolide Minor Use Crop Candidates and Residue Data

Residue trials were conducted in crops and the crop group representative crops, including major and minor crops, to support the numerous minor crops on which fluopicolide is currently registered. Table 1 shows the minor use crop candidates included in this petition for extension of exclusive use of data and the corresponding residue data used to support the registration of these minor crops.

Therefore, residue studies supporting registration are available for 18 minor use crop candidates. Of those, three minor use registrations (horseradish, ginseng, and garlic) supported by residue data generated on representative crops for crop group tolerances are given in Table 1

All of the minor use crop candidates were registered within the requisite seven year period (prior to January 28, 2015) and added to the technical fungicide label.

Candidate No.	Crop Candidate	2012 Acres <sup>1</sup>	Residue Data to Support	MRID #	IR-4 Data	Date Registered	Crop Grou p No.	Documen t Section Number
1	Mustard green	6,925	Mustard green	47859901		4/20/2011	5B	3.0
2	Broccoli	128,938	Broccoli	47021701	х	5/30/2008	5A	4.0
3	Cabbage, head	66,035	Cabbage	47021702	х	5/30/2008	5A	5.0
			Tomato	46708536		1/28/2008	8	
		<31,854	Chili pepper	46708535		1/28/2008	8	
		49,762	Bell pepper	46708530		1/28/2008	8	
		71,911	Cantaloupe	46708531		1/28/2008	9	
		111,900	Cucumber	46708532		1/28/2008	9	
		58,486	Squash	46708538		1/28/2008	9	
			Grape	46708541		1/28/2008		
4	Head lettuce	154,968	Head lettuce	46708533		1/28/2008	4	6.0
5	Leaf lettuce	69,973	Leaf lettuce	46708534		1/28/2008	4	7.0
6	Celery	32,577	Celery	46708539		1/28/2008	4	8.0
7	Spinach	46,377	Spinach	46708540		1/28/2008	4	9.0
8	Horseradish	3,195	Radish	47021704	х	5/30/2008	1A	10.0
9	Ginseng	373	Sugar beet	47021706	х	4/20/2011	1A	11.0
10	Carrot	99,293	Carrot	47021705	х	4/20/2011	1A	12.0
11	Sweet potato	125,726	Potato	46708537		4/20/2011	1C	13.0
12	Onion, bulb	149,960	Onion, Bulb	47021703	х	5/30/2008	3	14.0
13	Garlic	24,162	Onion, green	47021703	х	5/30/2008	3	15.0
			Tobacco	48924102		1/12/2015		

#### Table 1: Fluopicolide Minor Use Crop Candidates

<sup>1</sup>2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp. Residue studies supporting registration are available for 13 minor crops, thus qualifying fluopicolide for a 3-year extension of data exclusivity (1 year for each of 3 minor crops up to a maximum of 3 years) provided the other criteria listed below are met.

Valent USA believes that the registration of fluopicolide on 13 minor crops meets all of the requirements and therefore qualifies for a 3-year extension of data exclusivity (1 year for each of 3 minor crops up to a maximum of 3 years).

Candidate	Candidate			Crit	eria		Document
No	Crop	Key Fungal Diseases	1	П	Ш	IV	Section No.
1	Mustard green	downy mildew; Pythium root rot; Phytophthora root rot	~		~		3.0
2	Broccoli	downy mildew; Pythium root rot; Phytophthora root rot	~		~		3.0
3	Cabbage	downy mildew; Pythium root rot; Phytophthora root rot	~		~		5.0
4	Head lettuce	downy mildew			$\checkmark$	✓	6.0
5	Leaf lettuce	downy mildew			~	~	7.0
6	Celery	downy mildew			✓		8.0
7	Spinach	downy mildew, white rust			~	~	9.0
8	Horseradish	Pythium root rot	✓		~		10.0
9	Ginseng	Pythium damping-off, Phytophthora foliar blight and root rot			~	✓	11.0
10	Carrot	Pythium damping off, root rot, cavity spot, forking and stubbing			~	~	12.0
11	Sweet potato	mottle necrosis			~	$\checkmark$	13.0
12	Onion, bulb	downy mildew			✓	$\checkmark$	14.0
13	Garlic	downy mildew			✓	✓	15.0

#### Table 2: Summary of the Criteria Met by Each of the Minor Use Crop Candidates

Criteria:

(I) There are insufficient efficacious alternative registered pesticides available for the use;

(II) The alternatives to the minor use pesticide pose greater risks to the environment or human health;

(III) The minor use pesticide plays or will play a significant part in managing pest resistance; or

(IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

#### Meeting the Criteria for Extension of the Period of Exclusive Data Use

Details of how fluopicolide meets the exclusivity criteria for various minor uses are described below.

#### Criteria:

(I) There are insufficient efficacious alternative registered pesticides available for the use;

(II) The alternatives to the minor use pesticide pose greater risks to the environment or human health;

(III) The minor use pesticide plays or will play a significant part in managing pest resistance; or

(IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Each section gives: 1) the acreage for the particular crop(s) and the pest/crop problems; 2) the justification of how fluopicolide meets the criteria for the particular use; and 3) appropriate references for that section.

#### 3.0 Justification for Fluopicolide Minor Use on Mustard Greens

#### 3.1 Acreage, Production and Major Disease Problems.

According to the 2012 Crop Acreage Data Reported to FSA (1), there were 6925 acres of mustard greens (Brassica juncea) planted in the U.S. Mustard greens are grown for fresh market consumption and processing, and top-producing states are Arizona, Arkansas, Georgia, and Wisconsin. Diseases caused by the Oomycete class of plant pathogens are destructive in certain years or environments, and include downy mildew, Pythium root rot, and Phytophthora root rot. Downy mildew (Peronospora parasitica) is an important disease of mustard greens and other brassicas during times of cool and wet weather, and can cause severe spotting of foliage. Losses to downy mildew can approach 25% under disease-favorable conditions (2). Pythium root rot (caused by several species of Pythium) can be problematic on mustard and other brassicas at seeding or transplanting when conditions are wet and cool, and results in significant loss of plant populations (3). Brassicas, including mustard, may also be affected by Phytophthora root rot (Phytophthora drechsleri, P. megasperma), particularly in poorlyrotated fields and where moisture is high (4). Although Phytophthora root rot is a minor disease in general, individual fields can be severely affected where favorable conditions prevail.

#### 3.2 Justification to meet Criteria:

#### (I) There are insufficient efficacious alternative registered pesticides available for the use

Conventional fungicides labeled for control of downy mildew, and which provide good efficacy against the disease, include azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), dimethomorph plus ametoctradin (FRAC groups 40 and 45), and fluopicolide (FRAC group 43) (5,6). Mefenoxam and fluopicolide are the only conventional fungicides labeled for Pythium root rot, and fluopicolide is the only conventional fungicide labeled for Phythophthora root rot.

A number of biopesticides based on microorganisms such as *Streptomyces* spp., *Bacillus* spp. and *Trichoderma* spp. (examples: Actinovate, Serenade, and Tenet) also have labels for these three diseases; however, these products are purely preventative in their recommended uses and require a tank-mix or alternation with another registered product when disease pressure is high (5). Potassium phosphite-based products are labeled for the combination of downy mildew, Pythium root rot, and Phytophthora root rot but suffer from the same limitations as biopesticides.

Fluopicolide (FRAC group 43) has a unique mode of action and is the only conventional product currently registered for control of the three Oomycete diseases (downy mildew, Pythium root rot, and Phytophthora root rot) that affect mustards and other brassicas. As such, fluopicolide fits well as a tank-mix or alternation partner for the biofungicides and potassium phosphites mentioned earlier.

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance

Key products for managing Oomycete diseases of mustard such as azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), and dimethomorph plus ametoctradin (FRAC groups 40 and 45) have a single-site mode of action and are therefore at risk for development of resistance (5). These products require users to adhere to resistance management tactics that include tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide has a unique mode of action (FRAC group 43) among the fungicides registered for use on mustard greens and is therefore ideally-suited for inclusion in resistance management programs.

#### 3.3 <u>References</u>

- 1. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- Keinath, A. and Smith, J.P. 2004. Crop Profile for Leafy Greens and Collards (Fresh Markets) in South Carolina. Southern IPM Center. <u>http://www.ipmcenters.org/cropprofiles/docs/SCleafygreens.pdf</u>.
- Damicone, J. 2014. Diseases of Leafy Crucifer Vegetables (Collards, Kale, Mustard, and Turnips). Fact Sheet EPP-7666, Oklahoma Cooperative Extension Service.
- 4. Koike, S., Gladders, P., and Paulus, A. 2007. Phytophthora root rot. Pp. 184-186 in: Vegetable Diseases: A Color Handbook. Academic Press, Boston MA.
- 5. CDMS Label Search. 2016. Greens (Mustard), United States, Fungicides. http://www.cdms.net.
- Sikora, E. and Keinath, A. 2016. Efficacy of Products for Disease Control in Brassicas. Page 180 in: 2016 Vegetable Crop Handbook for the Southeastern United States. Farm Journal Media, Lenexa KS. 308 pp

#### 4.0 Justification for Fluopicolide Minor Use on Broccoli

#### 4.1 Acreage, Production and Major Disease Problems

The 2012 Crop Acreage Data Reported to FSA (7) indicates that there were 128,938 acres of broccoli (Brassica oleracea) produced in the U.S. Broccoli is grown for processing and fresh market consumption primarily in California, Arizona, Washington, Oregon, and Maine. Important diseases affecting broccoli and caused by the Oomycete class of plant pathogens are downy mildew, Pythium root rot, and Phytophthora root rot. Downy mildew (Peronospora parasitica) is the most important of these diseases and is particularly damaging to seedlings when cool and wet conditions prevail (8). Seedling death can occur from early infections and damage to foliage is common later in the season; where two crops per season are grown, early outbreaks can contribute to higher levels of disease in later crops. Varieties of broccoli grown for processing are most susceptible, and systemic infections result in heads being unsuitable for freezing. Pythium root rot (caused by several species of Pythium) may affect broccoli and other brassicas at seeding or transplanting, particularly when conditions are wet and cool or if plant densities are high. The level of damage caused by this disease varies by year and location (9). Brassicas, including broccoli, may also be affected by Phytophthora root rot (Phytophthora drechsleri, P. megasperma), particularly in poorly-rotated fields and where moisture is high (10). Although a minor disease in general, Phytophthora root rot can severely affect individual fields where favorable conditions prevail.

#### 4.2 Justification to meet Criteria

#### (I) There are insufficient efficacious alternative registered pesticides available for the use

Conventional fungicides labeled for control of downy mildew, and which provide good efficacy against the disease, include azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), dimethomorph plus ametoctradin (FRAC groups 40 and 45), and fluopicolide (FRAC group 43) (11, 12). Mefenoxam and fluopicolide are the only conventional fungicides labeled for Pythium root rot, and fluopicolide is the only conventional fungicide labeled for Phthophthora root rot.

A number of biopesticides based on microorganisms such as *Streptomyces* spp., *Bacillus* spp. and *Trichoderma* spp. (examples: Actinovate, Serenade, and Tenet) also have labels for these three diseases; however, these products are purely preventative in their recommended uses and require a tank-mix or alternation with another registered product when disease pressure is high (11). Potassium phosphite-based products are labeled for the combination of downy mildew, Pythium root rot, and Phytophthora root rot but suffer from the same limitations as biopesticides.

Fluopicolide (FRAC group 43) has a unique mode of action and is the only conventional product currently registered for control of the three Oomycete diseases (downy mildew, Pythium root rot, and Phytophthora root rot) that affect mustards and other brassicas. As such, fluopicolide fits well as a tank-mix or alternation partner for the biofungicides and potassium phosphites mentioned earlier.

(III) The minor use pesticide plays or will play a significant part in managing pest resistance

Key products for managing Oomycete diseases of broccoli such as azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), and dimethomorph plus ametoctradin (FRAC groups 40 and 45) have a single-site mode of action and are therefore at risk for development of resistance (11). These products require users to adhere to resistance management tactics that include tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide has a unique mode of action (FRAC group 43) among the fungicides registered for use on broccoli and is therefore ideally-suited for inclusion in resistance management programs.

#### 4.3 <u>References</u>

- 7. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- Pscheidt, J. and Ocamb, C. 2015. Broccoli (*Brassica olereacea*) Downy Mildew (Staghead). In: Pscheidt, J.W., and Ocamb, C.M., senior editors. 2015. Pacific Northwest Plant Disease Management Handbook [online]. Corvallis, OR: Oregon State University. <u>http://pnwhandbooks.org/plantdisease/broccoli-brassicaoleracea-downy-mildew-staghead</u>.
- Pscheidt, J. and Ocamb, C. 2015. Broccoli (*Brassica oleracea*) Damping-Off. In: Pscheidt, J.W., and Ocamb, C.M., senior editors. 2015. Pacific Northwest Plant Disease Management Handbook [online]. Corvallis, OR: Oregon State University. <u>http://pnwhandbooks.org/plantdisease/broccoli-brassica-oleracea-damping</u>.
- 10. Koike, S., Gladders, P., and Paulus, A. 2007. Phytophthora root rot. Pp. 184-186 in: Vegetable Diseases: A Color Handbook. Academic Press, Boston MA.
- 11. CDMS Label Search. 2016. Broccoli, United States, Fungicides. http://www.cdms.net.
- Sikora, E. and Keinath, A. 2016. Efficacy of Products for Disease Control in Brassicas. Page 180 in: 2016 Vegetable Crop Handbook for the Southeastern United States. Farm Journal Media, Lenexa KS. 308 pp.

#### 5.0 Justification for Fluopicolide Minor Use on Cabbage

#### 5.1 Acreage, Production and Major Disease Problems

According to the 2012 Crop Acreage Data Reported to FSA (13), there were approximately 66,000 acres of cabbage (*Brassica oleracea*) planted in the U.S. Fresh market consumption and processing are the primary uses for cabbage. The major cabbage-producing states are Arizona, California, Florida, Georgia, New York, and North Carolina. Diseases caused by the Oomycete class of plant pathogens are important constraints to cabbage production, and include downy mildew, Pythium root rot, and Phytophthora root rot. Downy mildew (*Peronospora parasitica*) impacts cabbage and other brassicas during times of cool and wet weather (14). Seedling death can occur from early infections and damage to foliage is common later in the season; where two crops per season are grown, early outbreaks can contribute to higher levels of disease in later crops. Heavy leaf-spotting can result in heads being unmarketable. Pythium root rot (caused by several species of *Pythium*) occurs on cabbage and other brassicas at seeding or transplanting, particularly when conditions are wet and cool or if plant densities are high. The level of damage caused by this disease varies by year and location (15). Brassicas, including cabbage, may also be affected by Phytophthora root rot (*Phytophthora drechsleri, P. megasperma*), particularly in poorly-rotated fields and where moisture is high (16). Although a minor disease in general, individual fields can be severely affected by Phytophthora root rot where favorable conditions prevail.

#### 5.2 Justification to meet Criteria

## (I) There are insufficient efficacious alternative registered pesticides available for the use; or

Conventional fungicides labeled for control of cabbage downy mildew, and which provide good efficacy against the disease, include azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), dimethomorph plus ametoctradin (FRAC groups 40 and 45), and fluopicolide (FRAC group 43) (17, 18). Mefenoxam and fluopicolide are the only conventional fungicides labeled on cabbage for Pythium root rot, and fluopicolide is the only conventional fungicide labeled for Phythophthora root rot.

A number of biopesticides based on microorganisms such as *Streptomyces* spp., *Bacillus* spp. and *Trichoderma* spp. (examples: Actinovate, Serenade, and Tenet) also have labels for downy mildew, Pythium diseases, and Phytophthora diseases of cabbage; however, these products are purely preventative in their recommended uses and require a tank-mix or alternation with another registered product when disease pressure is high (17). Potassium phosphite-based products are labeled for the combination of downy mildew, Pythium root rot, and Phytophthora root rot but suffer from the same limitations as biopesticides.

Fluopicolide (FRAC group 43) has a unique mode of action and is the only conventional product currently registered for control of the three Oomycete diseases (downy mildew, Pythium root rot, and Phytophthora root rot) that affect cabbage and other brassicas. As such, fluopicolide fits well as a tank-mix or alternation partner for the biofungicides and potassium phosphites mentioned earlier.

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance; or

Key products for managing Oomycete diseases of cabbage such as azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40),

and dimethomorph plus ametoctradin (FRAC groups 40 and 45) have a single-site mode of action and are therefore at risk for development of resistance. These products require users to adhere to resistance management tactics that include tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide has a unique mode of action (FRAC group 43) among the fungicides registered for use on cabbage and is therefore ideally-suited for inclusion in resistance management programs.

#### 5.3 <u>References</u>

- 13. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- Pscheidt, J. and Ocamb, C. 2015. Cabbage and Cauliflower (Brassica spp.) Downy Mildew (Staghead). In: Pscheidt, J.W., and Ocamb, C.M., senior editors. 2015. Pacific Northwest Plant Disease Management Handbook [online]. Corvallis, OR: Oregon State University. http://pnwhandbooks.org/plantdisease/cabbageand-cauliflower-brassica-sp-downy-mildew-staghead.
- Pscheidt, J. and Ocamb, C. 2015. Cabbage and Cauliflower (Brassica spp.) Damping-Off (Wirestem). In: Pscheidt, J.W., and Ocamb, C.M., senior editors. 2015. Pacific Northwest Plant Disease Management Handbook [online]. Corvallis, OR: Oregon State University. http://pnwhandbooks.org/plantdisease/cabbageand-cauliflower-brassica-sp-damping-wirestem.
- 16. Koike, S., Gladders, P., and Paulus, A. 2007. Phytophthora root rot. Pp. 184-186 in: Vegetable Diseases: A Color Handbook. Academic Press, Boston MA.
- 17. CDMS Label Search. 2016. Cabbage, United States, Fungicides. http://www.cdms.net.
- Sikora, E. and Keinath, A. 2016. Efficacy of Products for Disease Control in Brassicas. Page 180 in: 2016 Vegetable Crop Handbook for the Southeastern United States. Farm Journal Media, Lenexa KS. 308 pp.

#### 6.0 Justification for Fluopicolide Minor Use on Head Lettuce

#### 6.1 Acreage, Production and Major Disease Problems

The 2012 Census of Agriculture reported 154,968 acres of head lettuce planted in the U.S., with the majority of production taking place in California and Arizona (19). Downy mildew, caused by the oomycete *Bremia lactucae*, is a major constraint to the production of head lettuce, and its greatest impact is in regions or seasons in which temperatures are cool (20). Downy mildew occurs as lesions on leaves, and losses of quantity and quality occur through direct damage by the disease and by invasion of secondary pathogens that cause rots in the field and in transit.

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance

Eight of the currently-labeled fungicides for lettuce downy mildew belong to one of three FRAC groups: Group 11 (azoxystrobin, fenamidone, pyraclostrobin) Group 33 (fosetyl-AL, phosphite, others]), and Group 40 (dimethomorph, dimethomorph + ametoctradin, mandipropamid). Each of these, along with mefenoxam (FRAC group 4), propamocarb (FRAC group 28), and oxathiapiprolin (FRAC group U15), have a single-site mode of action pose varying levels of risk for development of resistance (20, 21). Users of these fungicides are required to follow strict resistance management guidelines such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Of the fungicides registered for lettuce downy mildew, fluopicolide has a unique mode of action (FRAC group 43) and therefore is well-suited for use in alternations or tank-mixes to manage resistance.

## (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Integrated management tactics are crucial for management of lettuce downy mildew (20). Use of cultural practices, resistant varieties, and fungicides in a coordinated program serves to slow the appearance of new pathogen races (which may overcome varietal resistance to downy mildew), delay resistance to fungicides, and increase the overall level of disease control. Fluopicolide, with its unique mode of action and strong efficacy, would be a strong partner in integrated management programs for lettuce downy mildew.

#### 6.3 <u>References</u>

19. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.

 Matheron, M.E. 2015. Biology and Management of Downy Mildew of Lettuce. University of Arizona Cooperative Extension Bulletin AZ1682, 3 pp.
 CDMS Label Search. 2016. Lettuce, United States, Fungicides. http://www.cdms.net.

#### 7.0 Justification for Fluopicolide Minor Use on Leaf Lettuce

#### 7.1 <u>Acreage, Production and Major Disease Problems</u>

The 2012 Census of Agriculture reported 69,973 acres of leaf lettuce planted in the U.S., with the majority of production taking place in California and Arizona (22). Downy mildew, caused by the oomycete *Bremia lactucae*, is a major constraint to the production of leaf lettuce, and its greatest impact is in regions or seasons in which temperatures are cool (23). Downy mildew occurs as lesions on leaves, and losses of quantity and quality occur through direct damage by the disease and by invasion of secondary pathogens that cause rots in the field and in transit.

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance;

Eight of the currently-labeled fungicides for lettuce downy mildew belong to one of three FRAC groups: Group 11 (azoxystrobin, fenamidone, pyraclostrobin), Group 33 (fosetyl-AL, phosphite, others]), and Group 40 (dimethomorph, dimethomorph + ametoctradin, mandipropamid). Each of these, along with mefenoxam (FRAC group 4), propamocarb (FRAC group 28), and oxathiapiprolin (FRAC group U15), have a single-site mode of action pose varying levels of risk for development of resistance (23, 24). Users of these fungicides are required to follow strict resistance management guidelines such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Of the fungicides registered for lettuce downy mildew, fluopicolide has a unique mode of action (FRAC group 43) and therefore is well-suited for use in alternations or tank-mixes to manage resistance.

## (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Integrated management tactics are crucial for management of lettuce downy mildew (20). Use of cultural practices, resistant varieties, and fungicides in a coordinated program serves to slow the appearance of new pathogen races (which may overcome varietal resistance to downy mildew), delay resistance to fungicides, and increase the overall level of disease control. Fluopicolide, with its unique mode of action and strong efficacy, would be a strong partner in integrated management programs for lettuce downy mildew.

#### 7.3 <u>References</u>

- 22. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 23. Matheron, M.E. 2015. Biology and Management of Downy Mildew of Lettuce. University of Arizona Cooperative Extension Bulletin AZ1682, 3 pp.
- 24. CDMS Label Search. 2016. Lettuce, United States, Fungicides. http://www.cdms.net.

#### 8.0 Justification for Fluopicolide Minor Use on Celery

# **8.1** <u>Acreage, Production and Major Disease Problems. Acreage, Production and Major Disease Problems.</u>

Celery is grown mainly in California, Arizona, Florida, and Michigan; 32,577 acres were reported in 2012 (25). Diseases caused by oomycete pathogens are relatively minor in celery, and downy mildew (*Peronospora umbellifera*) is a common, although sporadic, example. Greatest potential for loss occurs during lengthy periods of leaf wetness, and the disease impacts foliage (26).

## (III) The minor use pesticide plays or will play a significant part in managing pest resistance; or

Although downy mildew is a relatively minor disease of celery, a number of fungicides are registered for control of this disease (27). This list of products is similar to that for downy mildew of other leafy vegetables. Eight of the fungicides labeled for downy mildew of celery are classified in one of three FRAC groups: Group 11 (azoxystrobin, fenamidone, pyraclostrobin), Group 33 (fosetyl-AL, phosphite), and Group 40 (dimethomorph, dimethomorph + ametoctradin, mandipropamid). Each of these has a single-site mode of action and are susceptible to the development of resistance (27). Labels for these products require users to follow strict resistance management guidelines such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide is the only FRAC group 43 fungicide registered for celery downy mildew and therefore is a strong choice for alternations or tank-mixes to manage resistance.

#### 8.3 <u>References</u>

- 25. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 26. Davis, R. M. & Raid, R. M. 2002. Compendium of Umbelliferous Crop Diseases. American Phytopathological Society Press.
- 27. CDMS Label Search. 2016. Celery, United States, Fungicides. http://www.cdms.net

#### 9.0 Justification for Fluopicolide Minor Use on Spinach

#### 9.1 <u>Acreage, Production and Major Disease Problems</u>

Spinach is grown in the U.S. for processing and fresh-market uses, with the majority of production taking place in California and Arizona; smaller-scale production occurs in New Jersey, Oklahoma, and Texas. An estimated 46,377 acres were harvested in 2012 (28). Downy mildew, caused by the oomycete *Peronospora farinosa* f. sp. *spinaciae*, is the most important disease of spinach in California, while white rust, caused by *Albugo occidentalis* is more problematic in eastern production areas (29, 30). Downy mildew occurs as lesions on leaves, affecting produce quality and weight. Additionally, leaves damaged by downy mildew are prone to post-harvest rots while in storage or transit (29). White rust damages foliage initially and under favorable environmental conditions, whole-plant collapse is common (30).

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance

Of the currently-labeled fungicides for spinach downy mildew and white rust, eight fall into one of three FRAC groups: Group 11 (azoxystrobin, fenamidone, pyraclostrobin), Group 33 (fosetyl-AL, phosphite), and Group 40 (dimethomorph, dimethomorph + ametoctradin, mandipropamid). These fungicides, as well as mefenoxam (FRAC group 4), propamocarb (FRAC group 28), and oxathiapiprolin (Orondis, FRAC group U15), have a single-site mode of action, and are at risk of resistance development (31, 32). Strict resistance management guidelines, such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping), must be followed by applicators. Fluopicolide, the sole member of FRAC group 43, is effective against downy mildew and white rust and has a unique mode of action, making it well-suited for use in alternations or tank-mixes to manage resistance.

## (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Management of spinach downy mildew and white rust requires an integrated approach that includes sound cultural practices, host resistance, and fungicides (r2, r3). Integrated disease management programs serve to slow the appearance of new pathogen races (which may overcome varietal resistance to downy mildew), delay resistance to fungicides, and provide the best-possible control of both downy mildew and white rust. Fluopicolide, with its unique mode of action and strong efficacy, would be a strong partner in integrated management programs for downy mildew and white rust of spinach.

#### 9.3 <u>References</u>

- 28. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- LeStrange, M. and Koike, S. 2012. UC IPM Pest Management Guidelines: Spinach. UC ANR Publication 3467. http://www.ipm.ucdavis.edu/PMG/r732100111.html
- 30. Anonymous. 2016. Spinach Texas Plant Disease Handbook. http://plantdiseasehandbook.tamu.edu/
- 31. CDMS Label Search. 2016. Spinach, United States, Fungicides. http://www.cdms.net.
- Pfeufer, E. 2015. Disease Control: Greens. 2016-2017 Vegetable Production Guide for Commercial Growers. University of Kentucky Cooperative Extension Service Publication ID-36. http://www2.ca.uky.edu/agcomm/pubs/id/id36/001-056.pdf.

#### **10.0** Justification for Fluopicolide Minor Use on Horseradish

#### 10.1 Acreage, Production and Major Disease Problems

Horseradish is a small-acreage crop (3,195 harvested acres in 2012) grown primarily in Illinois (approximately 1,500 acres), followed by Pennsylvania, Oregon, Washington, Wisconsin, and California (33). Horseradish has relatively few disease problems; however, soilborne diseases caused by *Pythium* spp., generally sporadic in nature, can be problematic at seeding or after plant emergence when conditions are wet and cool, resulting in stand losses (34).

#### 10.2 Justification to meet Criteria

(I) There are insufficient efficacious alternative registered pesticides available for the use;

Mefenoxam, azoxystrobin, and fluopicolide are the only conventional fungicides labeled for Pythium root rot (36, 37).

A number of biopesticides based on microorganisms such as *Streptomyces* spp., *Bacillus* spp. and *Trichoderma* spp. (examples: Actinovate, Serenade, and Tenet) also have labels for Pythium root rot; however, these products are purely preventative in their recommended uses and require a tank-mix or alternation with another registered product when disease pressure is high (35, 37). Potassium phosphite-based products are labeled for the combination of downy mildew, Pythium root rot but suffer from the same limitations as biopesticides.

Fluopicolide (Presidio, FRAC group 43) has a unique mode of action and is one of the few conventional product currently registered for control of Pythium root rot that affects Horseradish. As such, Presidio fits well as a tank-mix or alternation partner for the biofungicides and potassium phosphites mentioned earlier.

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance;

Pythium root rot is relatively minor disease of horseradish, and few products are registered for control of this disease (36). Each of these has a single-site mode of action and is susceptible to the development of resistance. Labels for these products require users to follow strict resistance management guidelines such as alternation with a different mode of action (designated by FRAC grouping) (36). Fluopicolide is the only FRAC group 43 fungicide registered for Pythium root rot on horseradish and therefore is a strong choice for alternations or tank-mixes to manage resistance.

#### 10.3 <u>References</u>

- 33. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 34. Considine, D.M. 1982. Foods and Food Production Encyclopedia. Van Nostrand Reinhold, New York.
- 35. Anonymous. 2007. Horseradish (Amoracia) Plant Health Problems. Connecticut Agricultural Experiment Station. http://www.ct.gov/CAES/cwp/view.asp?a=2823&q=377746
- 36. CDMS Label Search. 2016. Horseradish, United States, Fungicides. http://www.cdms.net.
- 37. Anonymous. 2016. Horseradish. 2016 Mid-Atlantic Commercial Vegetable Production Recommendations. Virginia Cooperator Extension Service. https://pubs.ext.vt.edu/456/456-420/456-420-pdf.pdf

#### **11.0** Justification for Fluopicolide Minor Use on Ginseng

#### 11.1 Acreage, Production and Major Disease Problems

Ginseng is grown for use as a medicinal herb, and is produced on approximately 374 acres in the U.S., with the majority of production taking place in Wisconsin (38, 39). Diseases caused by Oomycete pathogens can be particularly destructive during periods of excessive moisture on soil or foliage. Pythium damping-off (*Pythium* spp.) can cause significant damage to ginseng seedlings, while Phytophthora foliar blight and root rot (*Phytophthora cactorum*), among the most significant diseases of ginseng, can cause extensive blighting of foliage, root necrosis, and plant death (40).

#### 11.2 Justification to meet Criteria

# (III) The minor use pesticide plays or will play a significant part in managing pest resistance;

There are a number of options registered for control of Oomycete pathogens, and these fall into broad categories of biofungicides, protectants, and single-site inhibitors (41). Of the currently-labeled single-site fungicides for use on ginseng only two, Reason (fenamidone, FRAC group 11) and Presidio (fluopicolide, FRAC group 43) are registered for control of both Pythium damping-off and *Phytophthora* diseases. The labels of both products require strict resistance management guidelines, such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide, the sole member of FRAC group 43, has a unique mode of action, making it well-suited for use in alternations or tank-mixes to manage resistance.

(IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Recommended management practices for Pythium damping off and Phytophthora root rot / foliar blight of ginseng are based on integration of sound cultural practices (timing of planting, moisture management) and fungicides (40). Integrated disease management programs delay resistance to fungicides and provide the best-possible control of both Pythium root rot and *Phytophthora* diseases. Fluopicolide, with its unique mode of action and strong efficacy, would be a strong partner in integrated management programs for diseases of ginseng caused by Oomycete pathogens.

#### 11.3 <u>References</u>

- 38. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 39. Randall, J. and Cook, J. 2013. American Ginseng in Iowa: Ecology and History. Iowa State University Publication F-400. 4 pp.
- Hausbeck, M. 2013. Pest Management in the Future: A Strategic Plan for the Michigan and Wisconsin Ginseng Industry. National IPM Database. https://ipmdata.ipmcenters.org/documents/pmsps/MI\_WI\_ginseng\_PMSP\_2013.pd f.
- 41. CDMS Label Search. 2016. Ginseng, United States, Fungicides. http://www.cdms.net.

#### **12.0** Justification for Fluopicolide Minor Use on Carrot

#### 12.1 Acreage, Production and Major Disease Problems

Carrots are an important root crop grown in the United States for both fresh market and processing uses. Acreage in 2012 was reported to be 99,923 with greatest production taking place in California, Washington, Texas, Michigan, and Florida (42). Carrots are a cool-season crop and are prone to diseases caused by Pythium spp. (Oomycete) such as damping-off, root rot / dieback, cavity spot, and forking (43). These diseases are particularly damaging when soils are cool and moisture levels are high (44).

#### **12.2** Justification to meet Criteria

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance;

Diseases of carrot caused by *Pythium* spp. can be destructive under favorable environmental conditions. Numerous fungicides are registered for control of this disease (45). These include biofungicides (Actinovate, Bio-Tam, Cease, Double Nickel, Rhapsody, Rootsheid, Serenade, and SoilGard). A majority of conventional products are based on two active ingredients: metalaxyl / mefenoxam (FRAC Group 4), and azoxystrobin (FRAC Group 11); fenamidone (Reason) is also a member of FRAC Group 11. Other fungicides registered for *Pythium* diseases of carrot include cyazofamid (Ranman, FRAC Group 21) and polyoxin-D (PH-D, FRAC Group 19). These fungicides have a single-site mode of action and are at a medium-to-high level of resistance risk (45). Labels for these products require users to follow strict resistance management guidelines such as tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Biofungicides also require a tank-mix or alternation with another registered product when disease pressure is high. Fluopicolide is the only FRAC group 43 fungicide registered for diseases of carrot caused by *Pythium* spp. and is an efficacious choice for alternations or tank-mixes to manage resistance.

# (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Recommended management practices for *Pythium* diseases of carrot are based on combining cultural practices (timing of planting, moisture management) and fungicides (44). Integrated disease management programs slow the development of resistance to fungicides and provide the optimal control *Pythium* diseases. The unique mode of action and excellent efficacy of fluopicolide make it a suitable partner in integrated management programs for diseases of carrot caused by Oomycete pathogens.

#### 12.3 <u>References</u>

- 42. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 43. Davis, R.M. and Raid, R.N. 2002. Compendium of Umbelliferous Crop Diseases. American Phytopathology Society Press, St. Paul MN. 75 pp.
- 44. Nunez, J., Davis, R.M., and Turini, T.A. UC Pest Management Guidelines Carrot. 2016. http://ipm.ucanr.edu/PMG/r102100411.html.
- 45. CDMS Label Search. 2016. Carrot, United States, Fungicides. http://www.cdms.net.

#### 13.0 Justification for Fluopicolide Minor Use on Sweet Potato & Yam

#### 13.1 Acreage, Production and Major Disease Problems.

Sweetpotato (*Ipomoea batatas*) is native to the Americas; the term yam" is often used interchangeable with sweetpotato, however true yams belong to *Dioscorea* spp. and are unrelated. Sweet potato production occurs primarily in the southern US, with North Carolina being the leading production state with 63,000 acres producing 12.4 million cwt valued at \$177.3 million in 2012 (46). Mississippi (24,000 acres producing 3.5 million cwt) and Louisiana (10,000 acres producing 1.9 million cwt) are also major southern production centers and ranked 3 and 4 in the US. Texas, Florida, Arkansas and New Jersey have 1.2 to 6.4 thousand acres. Sweetpotato production has increased significantly in California which currently ranks 2<sup>nd</sup> nationally with 18,000 acres producing 6.2 million cwt. Total US production is 26.4 million cwt on over 130,000 acres valued at more than \$500 million. Sweetpotatoes are grown from early spring when pre-sprouted seed are bedded to produce transplants which are then grown in the field and harvested in late fall (47). Diseases caused by *Pythium* spp. are of minor importance, occurring mainly after transplanting and before harvest; these diseases tend to be most severe during periods of high soil moisture. Mottle necrosis is the most common Pythium disease of sweetpotato (48,49,50).

#### 13.2 Justifications of How Fluopicolide Meets the Above Criteria

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance

Diseases caused by Pythium spp. are a minor issue in production of sweetpotatoes. A number of fungicides are registered for control of these diseases (51), and include biofungicides (Actinovate, Double Nickel, Rhapsody, Serenade). The majority of single-site inhibitors registered for Pythium diseases of sweetpotato are grouped into two modes of action: azoxystrobin (Quadris and generic products, FRAC Group 11), fenamidone (Reason, FRAC Group 11), metalaxyl / mefenoxam (Ridomil Gold and generic products, FRAC Group 4). Cyazofamid (Ranman, FRAC Group 21) is labeled for *Pythium* diseases of sweetpotato as well. Such fungicides are at a medium-to-high level of resistance risk, and labels for these products require users to follow resistance management guidelines such as tank-mixing or alternation with a different mode of action (51). Biofungicides also require a tank-mix or alternation with another registered product when disease pressure is high. Fluopicolide is the only fungicide in FRAC group 43 that is labeled for diseases of sweetpotato caused by *Pythium* spp. and is an efficacious choice for alternations or tank-mixes to manage resistance.

### (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Recommended management practices for *Pythium* diseases of sweetpotato include cultural controls (timing of planting, moisture management) and fungicides (48, 50). Integrated disease management programs help to slow the development of resistance to fungicides and are the most effective way to manage *Pythium* diseases. The unique mode of action and strong performance of fluopicolide make it a suitable partner in integrated management programs for diseases of sweetpotato caused by *Pythium* spp.

#### 13.3 References

- 46. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 47. Crop Profile for Sweet potatoes in North Carolina, 2005. http://www.ipmcenters.org/cropprofiles/GetCropProfiles.cfm
- 48. Anonymous. 2016. Diseases and Disorders of Sweetpotatoes. North Carolina Sweetpotato Commission. http://www.ncsweetpotatoes.com/sweet-potato-industry/growing-sweet-potatoes-in-north-carolina/diseases-disorders/.

49. Clark, C.A., Ferrin, D.M., Smith, T.P., and Holmes, G.J. 2015. Diseases of Sweetpotato. Common Names of Plant Diseases. American Phytopathological Society Press.

http://www.apsnet.org/publications/commonnames/Pages/Sweetpotato.aspx.

- 50. Clark, C.A. and Moyer, J.W. 1988. Compendium of Sweet Potato Diseases. American Phytopathological Society Press, 74 pp.
- 51. CDMS Label Search. 2016. Sweetpotato, United States, Fungicides. http://www.cdms.net.

#### 14.0 Justification for Fluopicolide Minor Use on Onion, bulb

#### 14.1 Acreage, Production and Major Disease Problems

Onions are widely grown in the United States and rank in the top 5 in terms of vegetables produced in the country. Bulb onions are grown for fresh markets and also for storage, as well as for dehyrdration (52). The 2012 Crop Acreage Data report (53) indicates that approximately 150,000 acres of dry onions were produced, while roughly 5,600 acres of green onions were harvested. The major onion-growing states are California (all onion types), New Mexico (fresh market), and Washington (storage). Georgia is the leading producer of spring onions, and other leading producers of storage onions include Idaho, New York, Michigan, and Utah. Onions are affected by a wide range of soilborne and foliar diseases, including downy mildew (caused by the Oomycete pathogen *Peronospora destructor*). Downy mildew is extremely destructive when present during disease-favorable conditions and can cause losses of between 25 and 50% (54). Foliage affected by downy mildew becomes severely blighted resulting in reduced photosynthetic area and reduced bulb size; systemic infections cause disintegration of bulbs below ground (54).

#### 14.2 Justification to meet Criteria

### (III) The minor use pesticide plays or will play a significant part in managing pest resistance;

Downy mildew is a major, destructive disease of onions. A number of fungicides are registered for control of downy mildew (56), and include biofungicides (Actinovate, Double Nickel, Rhapsody, Serenade). Conventional protectants include fixed copper, chlorothalonil, and mancozeb. Single-site inhibitors include azoxystrobin (Quadris and generic products, FRAC Group 11), pyraclostrobin (Carbrio, FRAC Group 11), fenamidone (Reason, FRAC Group 11), mefenoxam (Ridomil Gold and generic products, FRAC Group 4), cyazofamid (Ranman, FRAC Group 21), dimethomorph (Forum, FRAC Group 40), zoxamide (Gavel, Zing; FRAC Group 22), oxatihiapiprolin (Orondis, FRAC Group U15), and mandipropamid (Revus, FRAC Group 40). In general, fungicides with a single-site mode of action are at a medium-to-high level of resistance risk and users are required to follow resistance management guidelines such as tank-mixing or alternation with a different mode of action (56). Biofungicides also require a tank-mix or alternation with another registered product when disease pressure is high. Fluopicolide is the only fungicide in FRAC group 43 that is labeled for downy mildew of onion and is an efficacious choice for alternations or tank-mixes to manage resistance.

(IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Management of onion downy mildew is based on the integration of cultural practices (disease-free planting stock, plant spacing, destruction of volunteer onions), resistant varieties (red onion only), and fungicides (54, 55). Integrated management practices reduce reliance on fungicides and thus help to slow the onset of resistance. The unique mode of action and strong performance of fluopicolide make it a suitable partner in an integrated management system for downy mildew of onion.

#### 14.3 <u>References</u>

- 52. Onions. 2015. Agricultural Marketing Resource Center. http://www.agmrc.org/commodities-products/vegetables/onions/.
- 53. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 54. Schwartz, H.F. 2011. Botrytis, Downy Mildew, and Purple Blotch of Onion. Colorado State University Extension Service Fact Sheet No. 2.941.
- 55. Nunez, J., Davis, R.M., and Turini, T.A. UC Pest Management Guidelines Onion and Garlic. 2016. http://ipm.ucanr.edu/PMG/r584100111.html.
- 56. CDMS Label Search. 2016. Onion, United States, Fungicides. http://www.cdms.net.

#### **15.0** Justification for Fluopicolide Minor Use on Garlic

Garlic was produced on 24,162 acres in the U.S. in 2012 (57). The bulk of harvested garlic is dehydrated and the remainder is cured for fresh market sale (58). California is the largest garlic-producing state (approximately 20,000 acres), followed by Oregon and Washington (57). Like onions, garlic production is negatively impacted by several soilborne and foliar diseases, including downy mildew (caused by the Oomycete pathogen *Peronospora destructor*). Downy mildew can cause losses when conditions are cool and damp (59). Foliar blighting results in smaller bulb size and reduced overall yield.

#### 15.1 Acreage, Production and Major Disease Problems

#### 15.2 Justification to meet Criteria

# (III) The minor use pesticide plays or will play a significant part in managing pest resistance; or

Downy mildew can be a serious disease of garlic under favorable conditions. Numerous fungicides are registered for control of garlic downy mildew (60). Biofungicides include Actinovate, Double Nickel, Rhapsody, Serenade, while conventional protectants include fixed copper, chlorothalonil, and mancozeb. Single-site inhibitors include azoxystrobin (Quadris and generic products, FRAC Group 11), pyraclostrobin (Carbrio, FRAC Group 11), fenamidone (Reason, FRAC Group 11), mefenoxam (Ridomil Gold and generic

products, FRAC Group 4), cyazofamid (Ranman, FRAC Group 21), dimethomorph (Forum, FRAC Group 40), zoxamide (Gavel, Zing; FRAC Group 22), oxatihiapiprolin (Orondis, FRAC Group U15), and mandipropamid (Revus, FRAC Group 40). In general, fungicides with a single-site mode of action are at a medium-to-high level of resistance risk and users are required to follow resistance management guidelines such as tankmixing or alternation with a different mode of action (60). Biofungicides also require a tank-mix or alternation with another registered product when disease pressure is high. Fluopicolide is the only fungicide in FRAC group 43 that is labeled for downy mildew of garlic and can be effectively used in alternations or tank-mixes to manage resistance.

## (IV) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Garlic downy mildew is best managed with a combination of cultural practices (diseasefree planting stock, plant spacing, destruction of volunteer garlic) fungicides (59). Integrated management practices reduce reliance on fungicides and thus help to slow the onset of resistance. The unique mode of action and high degree of efficacy for fluopicolide make it a good choice for use an integrated management system for downy mildew of garlic.

#### 15.3 <u>References</u>

- 57. 2012 Census of Agriculture. 2014. United States Department of Agriculture publication AC-12-A-51. 695 pp.
- 58. Onions. 2015. Agricultural Marketing Resource Center. http://www.agmrc.org/commodities-products/vegetables/garlic-profile/
- 59. Nunez, J., Davis, R.M., and Turini, T.A. UC Pest Management Guidelines Onion and Garlic. 2016. http://ipm.ucanr.edu/PMG/r584100111.html.
- 60. CDMS Label Search. 2016. Garlic, United States, Fungicides. http://www.cdms.net.

#### **16.0** Qualification for Extension of Exclusive Data Use

FIFRA Section 3(c) (1) (F) (ii) allows for the extension of the period of exclusive data use by one additional year for each three minor uses registered within seven years of the initial registration up to a total of three additional years provided that:

(*I*) there are insufficient efficacious alternative registered pesticides available for the use; (*II*) the alternatives to the minor use pesticide pose greater risks to the environment or human health;

(III) the minor use pesticide plays or will play a significant part in managing pest resistance; or

*(IV) the minor use pesticide plays or will play a significant part in an integrated pest management program.* 

Table 1 summarizes the minor crops on which fluopicolide was registered during the first seven years after initial registration. Table 2 shows and the above text explains how each of the minor crops meets one or more of the above criteria.

### (I) There are insufficient efficacious alternative registered pesticides available for the use.

There are 18 minor crops that qualify for the extension of fluopicolide exclusive data use and we have discussed 13 of them in this document and identified how fluopicolide has a unique fit in controlling oomycete diseases. Despite a number of fungicides already registered for controlling oomycete diseases, fluopicolide, sold as Presidio® in the vegetable market has established itself as an important part of many disease control programs. This success is due to fluopicolide's high level of activity on important diseases and low use rates. In particular, fluopicolide is unique in that it is the only member of FRAC group 43, therefore has a unique mode of action, and is the only conventional product currently registered for control of the three Oomycete diseases (downy mildew, Pythium root rot, and Phytophthora root rot) that affect many of the important vegetable crops. As such, fluopicolide fits well as a tank-mix or alternation partner for the biofungicides, conventional pesticides, and potassium phosphites.

## (II) The minor use pesticide plays or will play a significant part in managing pest resistance.

Key products for managing Oomycete diseases of vegetable crops belong to a relatively limited range of FRAC groups with the most common being FRAC group 11, FRAC group 4, and FRAC group 40, or biologicals which have a single-site mode of action and are therefore at risk for development of resistance. These products require users to adhere to resistance management tactics that include tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide has a unique mode of action (FRAC group 43) among the fungicides registered for oomycete control and is therefore ideally-suited for inclusion in resistance management programs.

Many uses of fluopicolide result in better management of fungicide resistance. For example, many fungicides come pre-mixed as two active ingredients. Often, one of the active ingredients is ineffective against the target disease, either due to resistance or inherent inactivity. Use of multiple active ingredients in a premixed product often unintentionally promotes or maintains resistance in the fungal population. Fluopicolide is sold as a single active ingredient in Presidio® Fungicide, allowing growers to use it strategically when and where it is needed rather than automatically being applied along with another active ingredient in a premixed product. Fluopicolide, as the only FRAC Group 43 fungicide continues to be an important part of effective disease and resistance management programs in vegetables.

(III) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Key products for managing Oomycete diseases such as azoxystrobin (FRAC group 11), pyraclostrobin (FRAC group 11), mefenoxam (FRAC group 4), cyazoxfamid (FRAC group 21), dimethomorph (FRAC group 40), mandipropamid (FRAC group 40), and dimethomorph plus ametoctradin (FRAC groups 40 and 45) have a single-site mode of action and are therefore at risk for development of resistance. These products require users to adhere to resistance management tactics that include tank-mixing or alternation with a different mode of action (designated by FRAC grouping). Fluopicolide has a unique mode of action (FRAC group 43) among the fungicides registered for use on mustard greens and is therefore ideally-suited for inclusion in resistance management programs.

### 17.0 Conclusions

The registration of fluopicolide on 13 minor crops meets and exceeds the criteria for granting a three-year extension of the exclusive data use period. This gualifies to extend the exclusive use period from January 28, 2018 to January 28, 2021. Fluopicolide controls many economically important diseases in minor vegetable crops. Fluopicolide is a unique tool in vegetable crops because it has a unique mode of action (FRAC 43), is sold as a single active ingredient mixture (Presidio®) and is, therefore an important tank mix and rotation partner. In addition, in many vegetables crops, it is the only conventional fungicide registered on the major oomycete diseases affecting the crop. The labeled rate for Presidio® is 3-4 ounces per acre. Many alternative protectant fungicides are used at much higher rates and, by virtue of their rates, pose risks to the environment and potentially worker safety. Presidio®'s single mode of action allows for strategic placement in disease control programs without unnecessarily applying a second active ingredient when not necessary (as in premix products). An important disease spectrum and low use rates, compared its alternatives, makes fluopicolide an important tool for disease control, resistance management and environmental stewardship.

### 18.0 <u>Appendix 1</u> Brand Names of Fungicides with Active Ingredient and FRAC Code

azoxystrobin	Quadris	11
Bacillus subtilis (QST713 strain)	Serenade/Cease/Rhapsody	
Bacillus amyloliquefaciens strain D747	Double Nickel	
Fixed copper	Coside and others	M1
chlorothalonil	Bravo	M5
cyazoxfamid	Ranman	21
dimethomorph	Forum	40
dimethomorph plus ametoctradin	Zampro	40 45
fenamidone	Reason	11
fluopicolide	Presidio	43
fosetyl-AL	Aliette	33
Gliocladium virens strain GL-21	SoilGuard	
mancozeb	Dithane	M3
mandipropamid	Revus	40
mefenoxam	Ridomil Gold	4
metalaxyl	Ridomil	4
oxathiapiprolin	Orondis	U15
Polyoxin-D	PH-D	19
potassium phosphite	Phostrol and others	
propamocarb	Previcur	28
pyraclostrobin	Cabrio	11
Streptomyces lydicus	Actinovate	
(Trichoderma asperellum and Trichoderma gamsii)	Tenet/Bio-Tam	
Trichoderma harzianum Rifai strain KRL-AG2	Rootshield	
Zoxamide/mancozeb	Gavel	22+M3
Zoxamide/chlorothalonil	Zing	22+M5

### 19.0 Appendix 2 2012 Census of Agriculture Table 38

#### Table 38. Vegetables, Potatoes, and Melons Harvested for Sale: 2012 and 2007 [Totas may not add due to rounding. For meaning of abbreviations and symbols, see introductory text.]

Сгор	Total harv	rested	Harvest		Harvest fresh m		lotal han	
	Farms	Acres	Farms	Acres	Farms	Acres	Farms	Acres
/egetables harvested for sale (see text)	72,045	4,492,086 7,511	13,072	1,977,490	65,814	2,514,596	69,172	4,682,58
0.1 to 0.9 acres	17,176	7.511	1,574	442	16,517	7,069	13,426	5.75
1.0 to 4.9 acres	29.618 10,400	59,177 82,059	3.283 1.289	2,548 4,234	29.055 10,178	56,629 77,825	27.752 11.069	57.78 87.16
5.0 to 14.9 acres	2,684	49,934	518	6,530	2,415	43,403	2,990	55,64
250 to 49 9 acres	3.023	105,550	1,139	34 368	2.157	71 183	3.573	124.41
250 to 49.9 acres	3.023 2.648	184,296	1.378	34,368 87,257	1.506	71,183 97,039	3.093	124.41 212.37
100.0 to 249.9 acres	2,933	461,154	1,664	230,869	1,651	230,285	3,451	536,56
250.0 to 499.9 acres	1,637	569,544	1.003	283,366	975	286,178	1,791	615,9
500.0 to 749.9 acres	660	396,500	433 209	198,490	418 258	198,011	720	430.7
750.0 to 999.9 acres	356	307,078	209	132,041	258	175,038	360	309.5
1.000.0 acres or more	910	2,269,282	582	997,346	684	1,271,935	947	2.246.5
1,000.0 to 1,999.9 acres	552	753,903	347	332,968	418	420,935	591	814.6
2,000.0 to 2,999.9 acres	157	377,207 409,945	102 72	171.275 171.801	110	205,932	159	386,0
3,000.0 to 4,999.9 acres 5,000.0 acres or more	109	728,226	61	321,302	82 74	238,145 406,923	123 74	458.1 587.6
rtichokes (excluding Jerusalem)	167	7.339	11	21	165	7.318	118	9.6
sparagus, bearing age	2,691	28,306	224 70	8.091	2,580	20,216	2,605	43.0
0.1 to 0.9 acres	693	435	30	39	686	1.222	1,408 733	1,3
5.0 to 14.9 acres	139	1,139	23	141	129	998	158	1,3
150 to 24.9 acres	34	642	15	287	10	355	56	1.0
250 to 49.9 acres	49	642 1,739	15 24	287 744	19 30	996	65	2.3
50.0 to 99.9 acres	61	4,127	36	1,916	41	2,211	67	4,5
100.0 acres or more	67	18,964	26	4,954	60	14,011	118	31,95
eans, green limas	909	45.096	321	38,824	612	6,273	1.020	42.5
eans, snap (bush and pole) 0.1 to 0.9 acres	22,289	266,114	2,615	172,530	20,524	93,584	17.300	303,9
0.1 to 0.9 acres	17,305	3,854	1.260	211	16,630	3.643	12.347	2.9
1.0 to 4.9 acres	3.070 476	4,966 3,636	225	229 478	3,000 432	4.737 3.158	2.829	4.6
150 to 24.9 acres	143	2,757	65 74	1.215	404	1,542	167	3.2
250 to 49.9 acres	329	11,698	228	8,165	110	3,533	369	12.9
500 to 99.9 acres	298	20,938	249	17 440	60	3,498	392	27.1
100.0 to 249.9 acres	407	63.329	327	17,440 49,798	98	13,530	479	72.0
250.0 to 499.9 acres	164	63.329 55.702	327 124	39,517	98 54	16,185	165	72.0
500.0 acres or more	97	99,235	63	55,477	47	43,757	118	122,6
eets	3,719	12,933	186	7,288	3,592	5,644	2,744	8.4
rocroli	3,636	128,938	113	11,442	3,580	117,496	3,087	130,6
0.1 to 0.9 acres	2,635	592	43	5	2,617	587 1,075	2.227	4
1.0 to 4.9 acres	601	1.081	10	6	599	1,075	471	8
5.0 to 14.9 acres	120	939	3	18	119	921	71	5
150 to 24.9 acres	24 27	454	5	(D) 217	19	(D)	37	6
250 to 49.9 acres	27	912		217	20 37	695	33	1.1
500 to 99.9 acres	45	3,098	8	470	37	2,628	40	2.9
100.0 to 249.9 acres	54	8,593	13	1,697	43 52	6,895	81	12.7
250.0 to 499.9 acres	55	18,872	(	1.329	54	17,543	52 29	17.9
500.0 to 749.9 acres	24	13,723	3	(D) 1.969	24	(D) 10.016	29	16,9
1.000.0 acres or more	24 14 37	68,692	11	5.218	24 13 37	63,474	38	69.2
	658		23	2,107	655	5,462	483	
Brussels sprouts	748	7,569	54	2,107	736	7,909	403	3,87
Cabbage, Chinese				100 C				11,48
abbage, head	4,126 2,681	66.035	174	11.733	4.035	54,302 608	4.086	80.6 61
1.0 to 4.9 acres	824	618	65 18	10	2,642 819	1 476	2.480 843	1 5
5.0 to 14.9 acres	224	1,498	18	22 81	220	1,476	238	1,5 1,8 1,7
15.0 to 24.9 acres	63	1,128	5	90	59	1.038	97	1.7
250 to 49.9 acres	81	2.774	15	436	73 76 74	2.337	116	3.9
50.0 to 99.9 acres	87	5.644 13.217	17 17	799	76	4.845	114	7.5
100.0 to 249.9 acres	87	13,217	17	2,191	74	11,026	101	15,3
250.0 to 499.9 acres	52 27	18,193	10	2,541 5,563	47 28	15,652 15,616	64 33	21.5
					100		0.0	
abbage, mustard	42	155	(X)	(X)	42	155	53	
antaloupes and muskmelons	9,684 6,305	71,911	31 (NA)	456 (NA)	9,675 (NA)	71,455 (NA)	9,148	84,2
1.0 to 4.9 acres	2,502	4,583	(NA)	(NA)	(NA)	(NA)	2,637	4.7
5.0 to 14.9 acres	521	3 723	(NA)	(NA)	(NA)	(NA)	563	4.1
150 to 24.9 acres	521 87	3,723	(NA)	(NA)	(NA)	(NA)	102	1.8
250 to 49.9 acres	62	2.223	(NA)	(NA)	(NA)	(NA)	84	2.8
500 to 99.9 acres	57	3,874	(NA)	(NA)	(NA)	(NA)	63	4.1
100.0 to 249.9 acres	82	12,431	(NA)	(NA)	(NA)	(NA)	93	14,3
250.0 to 499.9 acres	41	14,355 27,547	(NA) (NA)	(NA) (NA)	(NA)	(NA) (NA)	34 30	11,2 39,3
0/17/35			304	a denne de la	4.266	1.1.1.1	2 543	
0.1 to 0.9 acres	4,468 3,728	99.293 713	135	29,050 25	3,644	70,244 689	1,929	90.2
1.0 to 4.9 acres	400	651	16	11	397	640	245	3
5.0 to 14.9 acres	61	481		71	56	411	55	4
150 to 24.9 acres	21 32	391	12 17	228	e .	164	35 43	6
250 to 49.9 acres	32	1,089	17	498	19	591	43	1,5
500 to 99.9 acres	60	4,202	33	2,152	33	2,050	56	3,9
100.0 to 249.9 acres	83	13,035	48	6,614	48	6,421	86	13,4
250.0 to 499.9 acres	36 47	13,139 65,592	20 16	5.848 13.604	22 38	7.292 51,987	57 37	20.1 49.4
	100 March 100 Ma		17.55			ST 201		
aulfower	1,330	42,081	72 16	3,368	1,295	38,713	1,136	39.5
0.1 to 0.9 acres	845	212	16	3	837	209	660	1
1.0 to 4.9 acres	260	472	6 2 4	4	258	468	257 47	44
5.0 to 14.9 acres	53	385	4	(D) 60	52 13	(D) 239	47	4

#### 2012 Census of Agriculture - UNITED STATES DATA USDA. National Agricultural Statistics Service

United States 33

Crop	Total harv	ested	Harvest	ed for ising	Harves fresh n	ted for harket	2007 total harvested	
	Farms	Acres	Farms	Acres	Farms	Acres	Farms	Acres
Caulifower - Con.								
25.0 to 49.9 acres	30 34	994 2.274	13	336	22	659	18	65
50.0 to 99.9 acres	34	2,274	11	623	22 26	1,651	39	2.70 7.42
100.0 to 249.9 acres	35 37	5.817 12,558	10 6	1,080 812	30 37	4,737	45 31	10,4
500.0 acres or more	20	19,071	4	(D)	20	(D)	20	16,92
	100	100000000	18.5		475	1000	200	
Selery	488	32,577	31	2,192	4/5	30,385	326	29,90
Chicory	48	1,377	(X)	(X)	48	1.377	46	2.11
Collards	1.407	12,542	61	2.538	1,376	10.005	1.374	11.22
		12,042					1,074	
Cucumbers and pickles	14,183	111,900	894	65,957	13,571	45,943	11,202	151,75
0.1 to 0.9 acres	. 11,550 1,814	2,499 2,881	518	91 78	11,216	2,408	8,474	1,9
5.0 to 14.9 acres	265	2.027	71 22 33	188	251	1,838	287	2.2
15.0 to 24.9 acres	108	2,043	33	574	81	1,469	118	2.2
25.0 to 49.9 acres	106	3,588 8,263	39 74	1,296 4,651	67 58	2.292 3.611	147 151	5.0 10.3
100.0 to 249.9 acres	122	17,150	63	8,899	58	3,611	151	10.3
250.0 to 499.9 acres	60	20.446	41	13,425	23	8.252 7.022	80	23,6
500.0 acres or more	45	53,004	33	36,755	61 23 23	16.249	67	76.8
- 10 - 1						1000		
aikon	. 207	852	1	(D)	206	(D)	139	6
ggplant	3,473	5,004	101	169	3.446	4,835	2,904	6,0
scarole and endive	109	2.030	(X)	(X)	109	2.030	133	3.6
scarble and endive	109	2.030	(A)	(A)	109		133	
arlic	3,408	24,162	220	12,135	3,306	12,027	2.277	26,1
inseng	140	373	83	(D)	66	(D)	225	6
lerbs, fresh cut	2,255	9.045	(X)	(X)	2,255	9,045	2,053	13,5
onevdew melons	534	11,180	(X)	(X)	534	11,180	396	17,3
		2.405	1.5		100			
orseradish	. 124	3,195	26	3,028	103	167	112	3,6
ale	2,500	6,256	78	721	2,449	5,535	954	3,9
ettuce, all	5.757	323,359	(X)	(X)	5,757	323.358	3,839	313.0
0 1 to 0.9 acres	4.401	1.064	(X)	8	(NA)	(NA)	2,737	6
1.0 to 4.9 acres	799	1,508	(X)	(X)	(NA)	(NA)	505	9
5.0 to 14.9 acres	142	1,156	(X)	(X)	(NA)	(NA)	131	1,1
15.0 to 24.9 acres	48	887	(X)	(X)	(NA) (NA)	(NA) (NA)	38 75	2.5
25.0 to 49.9 acres	46	1,621 3,560	(X)		(NA) (NA)	(NA) (NA)	75	2.5
100.0 to 249.9 acres	64	10,096		8	(NA)	(NA)	82	13,3
250.0 to 499.9 acres	55	19,758	22	22	(NA)	(NA)	52	18.1
500.0 to 749.9 acres	37	21,821 20,052	(X)	(X)	(NA) (NA)	(NA)	53 27	31.6
750.0 to 999.9 acres	23	20,052		888888888888888	(NA)	(NA)	27	22.9
1,000.0 acres or more	91	241,838	(X)	(X)	(NA)	(NA)	88	217,3
Letuce, head	2,175	154,968	(X)	(X)	2,175	154,968	1,158	166,8
0.1 to 0.9 acres	1,594	351	(X)	(X)	(NA)	(NA)	707	1
1.0 to 4.9 acres	286	481	(X)	(X)	(NA)	(NA)	116	1
5.0 to 14.9 acres	41	320	(Q)	(2)	(NA) (NA)	(NA)	30 15	2
25.0 to 49.9 acres	15	518	201	22	(NA)	(NA)	34	1 1
50.0 to 99.9 acres	32	2,175	(X)	(X)	(NA)	(NA)	36	2.4
100.0 to 249.9 acres	43	2.175 7.071	(X)	(X)	(NA)	(NA)	61	9,4
250.0 to 499.9 acres	34	12,180	(X)	(X)	(NA) (NA)	(NA) (NA)	53	18,3
500.0 to 749.9 acres	34 28 23	16,310	(X)	(X)	(NA) (NA)	(NA) (NA)	53 32 15	19,0
1,000.0 acres or more	54	\$5,561	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	(NA)	(NA)	59	102,8
		1222		25.5	110702			
Letuce, leaf	4,055	69,973	(X)	(X)	4.055	69,971	2,891	58,8
Lettuce, romaine	1,537	\$8,418	(X)	(X)	1,537	98,418	1.057	87.3
Austard greens	1.095	6.925	50	1.221	1.073	5,705	871	8.3
kra	2,487	2,377	106	(D)	2,445	(D)	2,555	2.4
0.1 to 0.9 acres	6,192	149,960	410	42,497	5,937	107,463	4,249	166,4
0.1 to 0.9 acres	4,623	1,001	144	18	4,529	983	2,720	6
1.0 to 4.9 acres	656	1,047	23	42	643	1,005	490	
5.0 to 14.9 acres	110	875	16 17	117	97	758	137	1.0
15.0 to 24.9 acres	146	1,296	26	246	59	1.049 4.193	93 175	1.7
50.0 to 99.9 acres	198	13,934	26	2.292	130 176	11.642	177	12.3
100.0 to 249.9 acres	243	13,934 37,457	80	10,383	189	11.642 27.074	276	6.1 12.3 43.7
250.0 to 499.9 acres	88	30,347	39 24	10.245	66	20.102 40.657	119	40.0
500.0 acres or more	. 58	69,003		18,346	48		62	60,0
nions, green	1.829	5,624	73	940	1.806	4,683	1,558	5,7
arsley	482	4.661	23	705	470	3,956	370	4.2
'eas, Chinese (sugar, snow)	. 991	9,311	86	6,031	919	3,280	863	8,8
eas, green (excluding southern)	4,931	192,632	1,723	186,316	3,282	6.317	4,532	214,0
eas, green (excluding southern) 0.1 to 0.9 acres	2,719	553	101	22	2.649	531	1,818	4
1.0 to 4.9 acres	470	886	29 33 105	31	460	855	579	1.0
5.0 to 14.9 acres	127	1.037 2.396	33	328 (D)	97 21	709 (D)	131 212	1.0

### Table 38. Vegetables, Potatoes, and Melons Harvested for Sale: 2012 and 2007 (continued) [Totals may not add due to rounding. For meaning of abbreviations and symbols, see introductory text.]

#### **34 United States**

#### 2012 Census of Agriculture - UNITED STATES DATA USDA, National Agricultural Statistics Service

Сгор	Total han	vested	Harvest	ed for sinc	Harvest fresh m	ed for arket	2007 total harvested	
	Farms	Acres	Farms	Acres	Farms	Acres	Fams	Acres
Peas, green (excluding southern) - Con.								
50.0 in 99.9 acres	472	32403	456	31 304	19	1,098	542	36.4
50.0 to 99.9 acres 100.0 to 249.9 acres	472 387	32403 58098	456 380	31,304 56,632	11	1,466	542 382	36,4
250.0 to 499.9 acres	101	34105	100	33,245	7	860	107	36,8
500.0 acres or more	47	45594	47	(D)	1	(D)	56	51,8
eas, green southern (cowpeas) -	00000000	10	1.000	10000000		1000000	10000000	
blackeyed, crowder, etc	3,419	21.942	312	10,202	3,264	11,740	3,061	27.0
anner: Bell /evoluting nimientos)	11,568	49762	476	6.317	11,315	43,445	9.572	62.3
eppers, Bell (excluding pimientos) 0,1 tc 0.9 acres 1.0 tc 4.9 acres	9.123	1978	338	49 66	8.942	1,929	7,113	1.6
1.0 tc 4.9 acres	1.834	2.993	55	66	1,808	2,928	1,780	2.
5.0 tc 14.9 acres	270 85	2055	20	104	265	1,952	301	2.
15.0 to 24.9 acres	88	3071	15	405	79 78	1,407	97	1.
50.0 to 99.9 acres	62	4 193	14	745	54	3.448	68	4.4
100.0 acres or more	106	33916	25	4.801	89	29,115	132	46.5
eppers, other than Bell (including chile)	7.951	31854	619	18.690	7,587	13,164	6,124	37.3
0.1 tc 0.9 acres	6,372	1338	374	66	6,160	1,272	4,689	1,0
	1.107	1821 1749	91	145	1.072 205	1,677	895	1.
5.0 to 14.9 acres	221	1.749	34 11	187	205	1,562	213	1.0
25.0 to 49.9 acres	221 55 72	2435	28	892	47 48	1,543	89 79	1.6
25.0 to 49.9 acres	50	3 504	25	1,697	30	1,808	57	4.1
100.0 acres or more	74	19985	56	15,529	25	4,457	102	24.6
otatoes	21.079	1,168 199	2.233	623,611	19,750	544,587	15.014	1,131,
0.1 1 0.0 00000	14,622	3705	789	148	14,134	3,557	8.877	2.4
0.1 to 4.9 acres 5.0 to 14.9 acres 15.0 to 24.9 acres 25.0 to 49.9 acres	3,698	6255	208	206	3,626	6,049	3,136	5.2
0.0 tc 14.9 acres	459	3516	48 26 77	424	438	3,219	464	3.
25.0 to 49.9 acres	206	2322 7272	77	2.591 7.732	146	4,681	214	3. 2. 7.
50.0 to 99.9 acres	272	19045	120	7,732	177	11,313	325 714	22.0
100.0 to 249.9 acres	586 479	94132 170945	284 249	39,128	392 322	55.004		114.2
250.0 to 499.9 acres	240	144547	249	66,414	167	99,964 78,133	525 221	132.2
750.0 to 999.9 acres	126	108 885	153 75	55.229	79	53,657	116	99.1
1.000.0 acres or more	266	607.574	204	380,461	162	227,113	274	562.6
1,000.0 to 1,999.9 acres	165	222,560	121 35	121,982 67,396	108	100,578	185	249,2
2,000.0 to 2,999.9 acres	43	100 324 284 690	35	67,396 191,084	21 33	32,928 93,606	43 46	105,1
3,too.o acres of more	1010000		0.0001	10000000	00100	1201210	1000 1000	
umpkins	15,840	90.165	794	16,218	15,490	73,947	15,088	92.9
adishes	1,228	14867	34	790	1,222	14,078	818	14.5
thubar?	697	1.121	54	149	658	972	574	1.4
pinach	1,594	46377	106	12,435	1,522	33,941	1,202	44.0
quash all	14,090	58486	489	8,387	13.838	50,099	11,821	54,
0.1 tc 0.9 acres 1.0 tc 4.9 acres	9 248	2 630 6 2 6 5	(NA) (NA)	(NA)	(NA)	(NA) (NA)	7 443	2.
1.0 tc 4.9 acres	3,455	6265	(NA)	(NA)	(NA)	(NA)	3,085	5,5
5.0 to 14.9 acres	788	6033	(NA)	(NA)	(NA) (NA)	(NA)	701	5.3
25.0 p 49.9 acres	182	6271	(NA) (NA)	(NA) (NA)	(NA)	(NA) (NA)	190	6.5
25.0 to 49.9 acres	115	3233 6271 7768	(NA)	(NA)	(NA)	(NA)	124	6.
100.0 acres or more	132	26287	(NA)	(NA)	(NA)	(NA)	111	23,6
Squash, summer	10,693	33 190	290	2,984	10,533	30,206	9,170	34,0
Squash, winter	6,517	25296	259	5,403	6,371	19,893	4,798	20,3
weet corn	25.632	572068	4.011	342,509	22,883	229,560	28,241	622.
0.1 tc 0.9 acres	11,628 7,513	3 3 3 9 14 7 1 9	932 729	196 840	11,105 7,286	3.143 13.879	9,970 10,123	20,3
5.0 to 14.9 acres	2,622	20954	228	827	2.585	20,127	3,566	27.
15 0 in 24 0 acros	738	13527 36106	228 112	1,593	664 575	11,934	963	17.
25.0 to 49.9 acres 50.0 to 99.9 acres	1.036 913	36106 63051	498 633	17.764 42.794	575 317	18.342 20.257	1,299	45.
100.0 acres or more	1,182	420374	879	278,496	351	141,878	1,103	433,
100.0 to 249.9 acres	735	108.650	565	82.911 62,730	192	25 739	789	117.
100.0 to 249.9 acres	263	87967	198	62,730	81	25,238	1,217 789 237	80,3
500.0 to 749.9 acres	79 42	46.402 34.750	60	33.270 15.041	24 25	13,132 19,709	74	43.
750.0 to 999.9 acres 1,000.0 acres or more	63	142,606	19 37	84,545	29	58,061	85	165.0
weat notations	2.202	125726	262	30,138	2,080	95,588	1,910	105,2
0.1 to 0.9 acres 1.0 to 4.9 acres	1,225	316	30	6	1,211	310	789	
1.0 to 4.9 acres	409 77	766	21	17	402	749	474	
5.0 tc 14.9 acres 15.0 to 24.9 acres	51	523 930	10 13 28	209	71 45	467 721	60	1.
25.0 to 49.9 acres	66	2.257	28	837	46	1,421	81	2.4
50.0 to 99.9 acres	85 135	5813	37	1,829	65	3,983	96	6.
100.0 to 249.9 acres	87	20180 29239	39	8,444	106 73	14.072 20.795	113 71	17.
500.0 acres or more	67	65703	26	12,633	61	53,070	57	49,
omatoes in the open	32,383 24,023	397.656 6.133	2,522	277,428	31.047 23.246	120,228 5,846	25,809 17,536	442.
1.0 to 4.9 acres	24,023 6,479	10731	434	287 427	23,246 6,379	5,846	6,251	10.
5.0 to 14.9 acres	933	6954	74	340 277	914	6,614	856	6,3
15.0 to 24.9 acres	142	2597	434 74 19 24	277	131	2 320	182	3.
	133 108	4 449 7 537	24 43	680 2,812	117 69	3.769 4.725	170 133	5.
	565 198	359255 31255	421	272.604 20,701	191 73	86,651 10,554	681	402.38
100.0 to 555 actions on more	198	31255 58180	421 132 137	20,701 42,962	73	10,554 15,219	240 221	38.

#### Table 38. Vegetables, Potatoes, and Melons Harvested for Sale: 2012 and 2007 (continued) [Totals may not add due to rounding. For meaning of abbreviations and symbols, see introductory text.]

2012 Census of Agriculture - UNITED STATES DATA USDA. National Agricultural Statistics Service United States 35

			2012	2			200	7
Crop	Total harvested		Harvested for processing		Harvested for fresh market		2007 total harvested	
	Farms	Acres	Farms	Acres	Farms	Acres	Farms	Acres
Tomatoes in the open - Con.								
500.0 to 749.9 acres	87 30 79	51,949 25,577 192,295	60 23 69	34,573 18,099 156,269	31 12 19	17.375 7.478 36,026	88 35 97	53,36 29,52 204,13
Turnip greens	719	7,070	31	2,036	707	5,033	836	9,36
Turnips	1,107	4,285	29	494	1,090	3,790	914	3,63
Watercress	100	733	(X)	(X)	100	733	62	67
Watermeions         0         10         0.5         9.8         9.	12,996 7,273 3,764 974 231 221 212 203 91 27	128.208 2.073 7.079 7.537 4.158 7.410 13.851 31.609 31.670 22.821	45 (NA) (NA) (NA) (NA) (NA) (NA) (NA)	479 (NA) (NA) (NA) (NA) (NA) (NA) (NA) (NA)	12,97' (NA) (NA) (NA) (NA) (NA) (NA) (NA)	127,730 (NA) (NA) (NA) (NA) (NA) (NA) (NA) (NA)	12,808 6,373 4,087 1,045 317 353 236 271 98 28	142,355 1,892 7,622 8,024 5,777 11,751 15,922 39,424 33,17 18,765
Other vegetables (see text)	8.057	74,455	493	17,774	7,880	56,681	6.846	47,56

#### Table 38. Vegetables, Potatoes, and Melons Harvested for Sale: 2012 and 2007 (continued)

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2012 Census of Agriculture - UNITED STATES DATA USDA, National Agricultural Statistics Service