

March 8, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Pruitt:

We write the Environmental Protection Agency (EPA) once again in support of an important insecticide – chlorpyrifos. In comments provided to your predecessors at the EPA during multiple comment periods since 2011, organizations representing thousands of American farmers and users of chlorpyrifos have repeatedly provided input to the EPA on the critical need for this insecticide. We have given EPA a simple, common message through the years – **retain the current crop tolerances and availability of use of the chlorpyrifos-containing products we need**. So far, all of our comments have gone unanswered.

Chlorpyrifos is one of the most widely used active ingredients in insecticides in the world. Since it was first registered in the United States in 1965, chlorpyrifos has played a key role in pest management efforts in the United States and around the world. Today, chlorpyrifos is registered in almost 100 countries worldwide for use on more than 50 different crops against damage caused by a wide range of insect pests. In the United States, chlorpyrifos is a critical tool for growers of over 50 different types of crops, including cereal, oilseeds, forage, fruit, nut, and vegetable crops. Farmers rely on chlorpyrifos because of its efficacy, low cost, tank mix compatibility, ease of implementation into existing integrated pest management (IPM) and integrated resistance management (IRM) programs, and minimal impact on beneficial insects. For many important pests, growers face limited or no viable alternatives to chlorpyrifos. When an outbreak of a new pest occurs, growers look to chlorpyrifos as a proven first-line of defense.

EPA is poised to make a decision by March 31, 2017, on whether to grant a 2007 petition to revoke all tolerances of chlorpyrifos. EPA has repeatedly claimed it needs to act quickly because of the Ninth Circuit Court of Appeals' response deadline. Regrettably, it appears this deadline is being used as a convenient excuse to override sound science and abandon the registration review process in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The Agency's actions thus far favor expediency over established, scientifically sound analysis mandated by statute in order to implement its policy shift on chlorpyrifos. We maintain that the Court's order that EPA rule on the pending petition to revoke tolerances does not justify a failure to conduct a thorough, science-based review of EPA's unprecedented methodologies being currently used.

Given the unprecedented regulatory action that EPA is proposing to undertake and the immense ramifications of that action, **we call on the EPA to deny the petition, to maintain the existing tolerances, and to complete FIFRA's registration review process for chlorpyrifos.**

Sincerely,

Agricultural Retailers Association
Almond Alliance of California
American Farm Bureau Federation

AmericanHort
American Seed Trade Association
American Soybean Association
American Sugarbeet Growers Association
Beet Sugar Development Foundation
California Citrus Mutual
California Citrus Quality Council
California Cotton Ginners and Growers Association
California Date Commission
California Dried Plum Board
California Fig Advisory Board
California Fresh Fruit Association
California Specialty Crops Council
California Strawberry Commission
California Walnut Commission
Cherry Marketing Institute
Cranberry Institute
CropLife America
Golf Course Superintendents Association of America
Florida Fruit and Vegetable Association
Oregonians for Food & Shelter
National Agricultural Aviation Association
North American Blueberry Council
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Potato Council
National Sorghum Producers
Northwest Horticultural Council
Schertz Aerial Service, Inc.
Sunsweet Growers Inc.
United Fresh Produce Association
U.S. Apple Association
Washington Friends of Farms & Forests
Washington State Potato Commission
Western Agricultural Processors Association
Western Growers
Western Plant Health Association

cc: Ray Starling, Special Assistant to the President for Agriculture, Trade and Food Assistance
The Honorable Michael Young, Acting Secretary, U.S. Department of Agriculture