



# PPC

## PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

August 9, 2024

Mr. Jake Li  
Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

*Submitted electronically via Federal eRulemaking Portal*

**RE: Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides (EPA-HQ-OPP-2024-0299)**

Dear Deputy Assistant Administrator Li,

The PPC represents agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses/entities, which are dependent on the availability of pesticides. Our coalition supports the development and implementation of public policies and laws that utilize the best available science and technology to ensure protection of human health and the environment.

PPC members include national and regional trade associations; commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators, and distributors; pest and vector-control applicators and operators; research organizations; state departments of agriculture; equipment manufacturers, and other interested stakeholders. The PPC serves as the unifying voice for the review, discussion, development and advocacy on pest management regulation and policy that is based on the best available science.

The public is confronted with increasing pest pressure, resistance management concerns, and disease threats introduced into the United States via trade, weather, and other factors. It is through pest control products, used by farmers, ranchers, public health officials, and other pesticide applicators, and produced by pesticide manufacturers, that we can address and mitigate impacts to food, fiber, and biofuel, and protect the public from these threats. These products are essential tools for protecting America's food and health from vector-borne disease, safeguarding our infrastructure from the damage caused by pests, and mitigating the increasing threat to the environment from invasive species.

As PPC members represent farmers and many other stakeholders who produce, use, or sell insecticides, we write to urge EPA to offer an extension to the public comment period for the Draft Insecticide

Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides (EPA-HQ-OPP-2024-0299) (hereafter “draft Insecticide Strategy” or “draft IS”). While we desire to offer thoughtful, quality feedback to EPA on this proposal, we are concerned there are several factors that will significantly impede our ability to do so during the short 60-day comment period EPA has afforded. To that end, we request that EPA offer an additional 90 days for public comment on the draft Insecticide Strategy.

Insecticides are vital to the continued productivity and sustainability of our activities, which we use to protect our nation’s food, fuel, and fiber supplies; maintain important conservation practices; defend infrastructure; sustain public health initiatives; among other critical uses. Based on our initial assessment in the two weeks since its public availability, we expect this lengthy, complex proposal—which, in addition to its supporting documents, totals more than 700 pages—would profoundly and fundamentally alter our continued ability to access and use insecticides. A proposal of this significance warrants our thoughtful consideration and ability to prepare meaningful feedback for EPA, which is simply not possible in the short 60-day comment period offered by the Agency.

Moreover, there are several other circumstances that further complicate our ability to comment and justify an extension to the draft IS public comment period, which include:

- **Interactions with Other ESA Proposals:** The draft IS is not being offered in a vacuum but is one of several Endangered Species Act (ESA) pesticide proposals EPA has offered over the past couple of years. EPA has also proposed its draft Herbicide Strategy, Vulnerable Species Pilot Project, and FIFRA Interim Ecological Mitigations, in addition to several chemical-specific proposals containing ESA provisions. Our initial assessment is that these proposals do not neatly align, but there are meaningful differences between them that may create implementation challenges. Stakeholders not only must consider the draft IS in this short 60-day comment period, but also seek to understand and incorporate input on the ways in which these several proposals interact and how that interaction may impact future pesticide access and use. These complications warrant additional time for consideration.
- **Numerous Other Concurrent Comment Periods:** EPA is also asking stakeholders to engage on numerous other open dockets during the 60 days in which the draft IS comment period is open. Currently, EPA’s pesticide program alone has open substantive public comment periods on proposed interim decisions for malathion (EPA-HQ-OPP-2009-0317), mancozeb (EPA-HQ-OPP-2015-0291), dicrotophos (EPA-HQ-OPP-2008-0440), dimethoate (EPA-HQ-OPP-2009-0059), and tetrachlorvinphos (EPA-HQ-OPP-2008-0316); revised risk assessments on clothianidin (EPA-HQ-OPP-2011-0865), imidacloprid (EPA-HQ-OPP-2008-0844), saflufenacil (EPA-HQ-OPP-2019-0524), and thiamethoxam (EPA-HQ-OPP-2011-0581); a draft biological opinion on methomyl (EPA-HQ-OPP-2024-0290); an application for a new use of dicamba and s-metolachlor (EPA-HQ-OPP-2024-0154); and a proposed framework to assess potential resistance risks of antibacterial or antifungal pesticides (EPA-HQ-OPP-2023-0445). All these comment periods close during or shortly after the current comment period for the Draft IS. Furthermore, EPA just closed three other comment periods which also overlapped with the draft IS strategy comment period, including proposed interim decisions for acephate (EPA-HQ-OPP-2008-0915), captan (EPA-HQ-OPP-2013-0296), and thiram (EPA-HQ-OPP-2015-0433).

Many of these proposals also impact our organizations and other stakeholders who are interested in commenting on the draft IS. Yet, by only allowing 60 days for public comment on the draft IS, a window which overlaps with so many other EPA pesticide proposals, the Agency is creating

barriers for many in the public who would like to offer feedback, and likely diminishing the quality of comments from those who are able to comment. By extending the public comment period, EPA will not only receive more diverse perspectives on the proposal, but also more meaningful feedback in comments received.

We understand EPA has offered a shorter comment period to stay on track to meet its settlement timelines for finalizing the Insecticide Strategy. However, we believe a shorter comment period may have the opposite effect and make the Agency's objective more difficult. By collecting quality, well-informed feedback, it will likely enable EPA to more quickly consider stakeholder perspectives than if public input is rushed and based in misunderstanding of this complex proposal.

We are eager to engage with EPA on the draft Insecticide Strategy to help the Agency meet its ESA and other legal obligations in a way that will allow for meaningful, continued use of insecticides. However, to provide EPA with the quality feedback on the proposal necessary to accomplish that goal, more time will be needed than has currently been provided. To that end, we urge EPA to extend the public comment period for the draft Insecticide Strategy by an additional 90 days. We thank you for your consideration of our request and look forward to what we hope is a careful, thoughtful engagement with EPA on this proposal in the weeks ahead.

If PPC members can be of assistance in any way, or if you have questions, please do not hesitate to contact us at [shensley@cotton.org](mailto:shensley@cotton.org) or (703) 475-7716 and Jeff Blackwood at [jblackwood@croplifeamerica.org](mailto:jblackwood@croplifeamerica.org) or (202) 604-3771.

Sincerely,



Steve Hensley  
Chair, Pesticide Policy Coalition



Jeff Blackwood  
Vice Chair, Pesticide Policy Coalition

## Pesticide Policy Coalition Members

ADAMA	National Alliance of Forest Owners
Agricultural Retailers Association	National Alliance of Independent Crop Consultants
American Chemistry Council, Biocides Panel	National Association of Landscape Professionals
American Farm Bureau Federation	National Association of State Departments of Agriculture
AmericanHort	National Associations of Wheat Growers
American Mosquito Control Association	National Corn Growers Association
American Mushroom Institute	National Cotton Council
American Seed Trade Association	National Farmers Union
American Soybean Association	National Onion Association
American Sugarbeet Growers Association	National Pest Management Association
American Vanguard	National Potato Council
Association of Equipment Manufacturers	North Dakota Grain Growers Association
BASF Corporation	Northwest Horticultural Council
Bayer Crop Science	RISE
California Citrus Quality Council	Scotts Miracle Gro
California Prune Board	Society of American Florists
California Farm Bureau	Syngenta Crop Protection
California Processed Onions Garlic Research Committee	U.S. Apple Association
California Specialty Crops Council	U.S. Beet Sugar Association
Corteva	U.S. Canola Association
Council of Producers & Distributors of Agrotechnology	U.S. Hop Industry Plant Protection Committee
CropLife America	USA Rice
Florida Fruit & Vegetable Association	Valent U.S.A Corporation
FMC	Washington State Potato Commission
Golf Course Superintendents Association	Western Growers
Gowan	Wilbur-Ellis Company
International Fresh Produce Association	
ISK Biosciences	
Minor Crop Farmer Alliance	
National Agricultural Aviation Association	