



PPC

PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

November 1, 2023

Wayne Cascio
Director, Center for Public Health & Environmental Assessment
Office of Research and Development
EPA Docket Center (ORD Docket), Mail Code: 28221T
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW, Washington, DC 20460

Submitted to Docket EPA-HQ-ORD-2012-0830

RE: Request for 180-Day Public Comment Extension on Draft Integrated Risk Information System (IRIS) Toxicological Review of Inorganic Arsenic, *Docket EPA-HQ-ORD-2012-0830*

The Pesticide Policy Coalition (PPC) respectfully requests a 180-day extension to the comment period on the Environmental Protection Agency's (EPA or the Agency) Draft Integrated Risk Information System (IRIS) Toxicological Review of Inorganic Arsenic.

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 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 increasingly confronted with 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 these threats. These products are essential tools for users to protect not only America's food,

fiber, and biofuel; but also, to protect public health from vector-borne disease, safeguard our infrastructure from the damage caused by pests, and mitigate the increasing threat to the environment from invasive species.

The Draft IRIS Toxicological Review of Inorganic Arsenic is lengthy, comprising over 600 pages altogether (including supplemental material). Further, the body of scientific evidence on arsenic toxicity is large and complex and a review by stakeholders and the public of the analysis of that scientific evidence by the IRIS staff requires comparison with the published literature and must be thorough. The draft assessment of inorganic arsenic has been in process by the IRIS staff for a decade. In 2013, the National Academy of Sciences (NAS), in a review of the 2010 draft mandated by Congress, found numerous shortcomings and provided recommendations for improvement. Following this NAS review, the IRIS program took a full six years to develop a protocol for a revised assessment, which was reviewed by the NAS in 2019. It has now taken the IRIS staff an additional four years to publish a revised draft for review. Surely, under these circumstances, providing a 180-day public comment period is fair and appropriate.

The finalized IRIS assessment of inorganic arsenic will have far-reaching impacts on many aspects of the U.S. economy, particularly in the food and agriculture sector. The widespread interest in this assessment necessitates sufficient time for impacted stakeholders to have their concerns raised and their voices heard.

The IRIS program has been justifiably criticized for many years for its lack of transparency. If EPA is truly interested in public input and comment on the draft IRIS assessment of inorganic arsenic, it is imperative that EPA honor this request and provide for a full 180-day comment period.

If PPC members can be of assistance in any way, or if you have questions, please do not hesitate to contact me at shensley@cotton.org or (703) 475-7716.

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley
Chair, Pesticide Policy Coalition

Attachment: Pesticide Policy Coalition Membership List

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
American Mosquito Control Association	National Associations of Wheat Growers
American Mushroom Institute	National Corn Growers Association
American Seed Trade Association	National Cotton Council
American Soybean Association	National Council of Farmer Cooperatives
American Sugarbeet Growers Association	National Farmers Union
American Vanguard	National Onion Association
Association of Equipment Manufacturers	National Pest Management Association
BASF Corporation	National Potato Council
Bayer Crop Science	North Dakota Grain Growers Association
California Citrus Quality Council	Northwest Horticultural Council
California Dried Plum Board	RISE
California Farm Bureau	Scotts Miracle Gro
California Processed Onions Garlic Research Committee	Society of American Florists
California Specialty Crops Council	Syngenta Crop Protection
Corteva	U.S. Apple Association
Council of Producers & Distributors of Agrotechnology	U.S. Beet Sugar Association
CropLife America	U.S. Canola Association
Florida Fruit & Vegetable Association	U.S. Hop Industry Plant Protection Committee
FMC	United Fresh Produce Association
Golf Course Superintendents Association	USA Rice
Gowan	Valent U.S.A Corporation
ISK Bioscience	Washington State Potato Commission
Minor Crop Farmer Alliance	Western Growers
National Agricultural Aviation Association	