



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

July 21, 2022

Anna Romanovsky
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

Submitted via regulations.gov

Re: Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses; EPA-HQ-OPP-2022-0490 -- REQUEST FOR EXTENSION TO COMMENT PERIOD

Dear Ms. Romanovsky:

The Pesticide Policy Coalition (PPC) respectfully requests a 90-day extension to the comment period on the U.S. Environmental Protection Agency's (EPA) request for public comment on a November 2021 petition requesting that the Agency revoke all tolerances and cancel all associated registrations for certain organophosphate pesticides (OP).

The PPC is an organization of food, agriculture, forestry, pest management, and related industries, including small businesses/entities, which are dependent on the availability of pest management tools. PPC members include nationwide and regional farm, 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; equipment manufacturers; and other interested stakeholders. PPC serves as a forum for review, discussion, development, and advocacy around pest management regulation and policy.

EPA is seeking comments on a November 2021 petition to revoke all tolerances and cancel all associated registrations for food uses for OPs, as well as a request for EPA to complete registration review on the OP class of chemicals by October 1, 2022. OPs are one of the few remaining classes of chemistry that is a broad-spectrum insecticide, an essential tool in integrated pest management programs. OPs protect crops from a wide range of insects, prolong the life of crops, and increase productivity. The continued availability of this group of pesticides is important to U.S. growers due to the safety and effectiveness of these proven pesticides.

This request to revoke tolerances for an entire class of chemicals is unprecedented. There are 15 active ingredients in this petition, some with an extensive variety of registered uses that impact PPC members, who will need sufficient time thoroughly to review and comment on this petition. PPC members depend on the timely availability of safe and effective crop protection and pest control tools to support sustainable food and fiber production, and to combat mosquito- and other insect-borne public health issues that impact all Americans. The availability of a variety of pesticide products is also a critical component in the management of pesticide resistance. The length of time to comment of 30 days is not sufficient for all the impacted industries and stakeholders to provide meaningful comments to EPA on this petition.

As a result, PPC respectfully requests EPA to extend the public comment period by 90 days to allow us to gather and submit additional information to develop more fully comments on this important matter. Should you have any questions or comments, please feel free to contact me at Thomas Mills at Tmills@croplifeamerica.org or (202) 872-3867.

Thank you for considering our views. If PPC members can be of assistance in any way, please do not hesitate to contact us.

A handwritten signature in cursive script that reads "Steve Hensley".

Sincerely,
Steve Hensley
Chair, Pesticide Policy Coalition

Megan Provost
Vice Chair, Pesticide Policy Coalition