



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

January 15, 2020

Attn: Rachel Vanderberg/Plant Division
Trade Policy and Geographic Affairs
Foreign Agricultural Service,
U.S. Department of Agriculture
1400 Independence Ave SW
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Via e-mail: Rachel.Vanderberg.usda.gov and PlantDivision@usda.gov

To Whom it May Concern:

The Pesticide Policy Coalition (PPC or “the Coalition”) appreciates the opportunity to submit the following comments to the Foreign Agricultural Service (FAS), U.S. Department of Agriculture (USDA) regarding the European Union’s recent proposal to the World Trade Organization (WTO) concerning the maximum residue limits (MRLs) for the active ingredients chlorpyrifos and chlorpyrifos-methyl.

The PPC is an organization of food, agriculture, forestry, pest management and related industries, including small businesses/entities, which support transparent, fair and science-based regulation of pest management products. 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 operators; research organizations; equipment manufacturers and other interested stakeholders. PPC serves as a forum for the review, discussion, development and advocacy around pest management regulation and policy.

PPC members rely on the predictable and timely availability of a diverse array of pesticide technologies. Access to a variety of pesticide products, in combination with best management practices, ensures pesticides are applied in a manner that is safe, effective, and manages pesticide resistance.

Pesticides are subject to rigorous regulatory review and approval process that is supported by robust risk assessment data and sound science. MRLs are not safety limits, but rather trading standards that facilitate trade among global trading partners. MRLs indicate whether plant pesticides were properly applied. Regulators set MRLs to ensure pesticide residues on products are well below toxicological safety thresholds. MRLs that are overly conservative and/or not supported by science can disrupt import and export of commodities and inflict economic damage on growers.

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The European Union (EU) is proposing to set the MRLs for chlorpyrifos and chlorpyrifos-methyl at the default level of 0.01 mg/kg for all commodities. The EU is basing its proposal solely on the grounds that it did not renew approvals for these substances along with an EFSA statement¹ developed prior to the completion of review of the manufacturers' application for renewal under the EU's peer review system for approval of pesticides².

The EU proposal does not provide a sound scientific basis for selecting the default limit, a level which in this case could inhibit trade of goods where even when good agricultural practices are followed and no health risk was presented by treated commodities. The immediate reduction of the MRL to the default level could hinder sale of the treated crop, even though it was authorized at the time of application.

The default limit in this case not only hinders trade of commodities, but also creates public perception that virtually any level of chlorpyrifos is unsafe. This premise is simply not supported by science. Setting the MRLs for chlorpyrifos and chlorpyrifos-methyl without a robust scientific process will impede trade simply on the basis of not having a renewed authorization without a proper scientific assessment of the safety of any residues in the treated commodity.

The PPC encourages USDA to raise these concerns with the WTO and encourage the WTO to reject the EU's proposal absent further scientific support for its selection of the limit of detection.

Sincerely,



Steve Hensley
Chair, Pesticide Policy Coalition



Beau Greenwood
Vice Chair, Pesticide Policy Coalition

¹ Statement on the available outcomes of the human health assessment in the context of the pesticides peer review of the active substance chlorpyrifos-methyl. EFSA Journal 2019;17(5):5810

² <https://www.efsa.europa.eu/en/press/news/chlorpyrifos-assessment-identifies-human-health-effects>