



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

April 29, 2021

Seth Meyer, Ph.D.
Chief Economist
Office of the Chief Economist
United States Department of Agriculture (USDA)
1400 Independence Ave, SW
Washington, DC 20250

Submitted electronically via Federal eRulemaking Portal

RE: Request for Comments: Executive Order on Tackling the Climate Crisis at Home and Abroad (USDA-2021-0003-0001)

Dear Dr. Meyer,

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 the review, discussion, development and advocacy around pest management regulation and policy.

PPC members confront changing pest and disease threats introduced into the United States via weather, trade, and other factors. Pesticide manufacturers work diligently to make pest control products available through, among other entities, a web of seed, fertilizer, and pesticide distributors, transportation networks, and pesticide application services. These efforts help ensure farmers, ranchers, public health officials, and other pesticide applicators have the tools they need to continue to produce America's food, fiber, and biofuel and to protect our public health and infrastructure. Many of these participants are small businesses reliant on annual, time-sensitive sales and labor to support American agricultural production and small businesses.

PPC members appreciate the opportunity to comment on: Executive Order on Tackling the Climate Crisis at Home and Abroad.

For many years PPC members have utilized conservation practices as part of routine agricultural production practices, and some of the most essential conservation practices for addressing climate change do, and will, rely on the availability of safe and effective pest control products. One prominent example is the utilization of modern herbicide products as part of conservation tillage practices which greatly reduce the energy inputs while adding to net carbon capture. Modern crop protection inputs are needed to continue and enhance these benefits at a scale which can significantly impact the climate crisis.

Numerous USDA policies may affect modern farming practices including pest control, and policies which foster continued improvements in crop productivity and research to enhance sustainable agricultural practices will be important contributors to reach climate goals. USDA support of research into pest control needs resulting from climate changes will be essential to maintain American agricultural productivity. Climate change could affect pest control in various ways, including greater pest resistance and fostering introduction of invasive species, and USDA research and programmatic activities will be needed to help address these issues.

We urge USDA to continue support for the essential role pesticides play in forest management as well as in protecting urban and suburban forested areas that will be impacted by all aspects of climate change. EPA-registered pesticide products provide solutions for forest and vegetation management and for management of invasive and harmful insect species that can decimate forests and urban trees. Support for scientifically robust and predictable pesticide regulation will help ensure products are available and in development to meet climate-driven pest problems here in the United States and abroad.

Also, consideration should be given to expanding USDA's climate smart programs and capacity to include turf, landscape plants and trees found in suburban and urban areas that are grown in nurseries, greenhouses and on turf farms. The growers and the professionals who will manage these green assets in towns and cities are important stakeholders in the contributions green spaces will and must make to managing the impacts of climate change.

United States trade policies supported by USDA programs fostering agricultural trade and technology transfer can also reduce the global pressure on ever-shrinking land available for crop production, which can contribute to climate risks due to deforestation or other land use related challenges. Global trade in agricultural commodities, and policies which support such trade, can reduce pressures on converting less productive areas to crop production. As a result, USDA support and research about the impact of productive agricultural practices can further contribute to climate goals.

In addition to direct climate impacts, many conservation practices have additional environmental benefits (examples: soil erosion and nutrient retention) as part of enhancing the sustainability of agriculture. At the same time, some of these conservation practices may lead to secondary pest challenges which will also need USDA help to evaluate and control.

USDA actions across many of its programs will have to be engaged to evaluate, predict, and respond to the possible impacts of climate change on agricultural production. As a result,

policies which foster not only trade, but also technology transfer of modern farming technologies, can reduce the climate and general environmental impacts of the need to feed a growing global population (estimated to double by 2050). Some of the more dire predictions about the impacts of climate change will press the resiliency of agricultural production systems world-wide; as a result, USDA research, analysis, and programs will likely have an important global role in preventing catastrophic outcomes.

We would also mention the importance of the continued role of USDA programs supporting the work of the Environmental Protection Agency (EPA). EPA regulation of pesticides benefits from the agricultural expertise USDA provides, and as crop protection tools continue to help address climate issues, USDA can contribute information and research about pest issues which result from climate change. EPA will need to maintain a timely, science-based approach to pesticide approvals, and USDA and other sister agencies will continue to play important roles in meeting that goal. Cross-agency coordination will be especially important to foster a predictable, science-based, pesticide regulatory system especially regarding compliance with the Endangered Species Act (ESA), where litigation outcomes currently threaten the continued availability of novel pest control products and technologies. As access to new technology is an important for productivity and sustainability, we encourage USDA to play a leadership role in helping EPA and the other relevant agencies meet this current programmatic challenge.

Lastly, the changing climate may further press USDA programs designed to provide growers with direct financial assistance as well as technical assistance to meet what may be daunting challenges. PPC members commend your efforts to both continue to provide on-going support to U.S. agricultural producers and at the same time prepare to meet the climate challenge that lies ahead.

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

Sincerely,



Steve Hensley
Chair, Pesticide Policy Coalition



Beau Greenwood
Vice Chair, Pesticide Policy Coalition