

April 13, 2016

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
Sent via email: [McCarthy.Gina@epa.gov](mailto:McCarthy.Gina@epa.gov)

Dear Administrator McCarthy:

As organizations representing U.S. agriculture and users of crop protection tools and pest control products, we are deeply concerned about EPA's planned Scientific Advisory Panel (SAP) meeting, April 19 to 21, to change the long-accepted, science-based regulatory endpoint for the pesticide chlorpyrifos, and we ask you to postpone this hastily called meeting.

Chlorpyrifos is a widely-used and widely-tested chemistry proven to be safe and effective for an array of commodities, specialty crops, and public health uses throughout the United States.

With this hasty and rushed SAP, EPA is attempting to fundamentally alter its process for evaluating potential risk and regulation of pesticides. EPA is moving forward as if the current regulatory process developed over four decades is broken. Recognizing the abruptness of this shift in approach and potential impact to all pesticides, the standards to be met for such a change should be set high. The failure to adhere to policies and regulations, reliance on a single epidemiological study for which the Agency does not even possess the underlying data, and lack of a solid basis for the most fundamental assumptions, do not meet such a high scientific or policy standard.

This not only would adversely affect chlorpyrifos; it also sets a terrible precedent for other organophosphates and pesticides. This also comes at a time when America's production agriculture is facing low commodity prices and strained budgets. If EPA proceeds with this European-style precautionary approach not based on sound scientific principles, we are going to lose valuable crop protection tools. Unfortunately, this path would have a chilling effect on the ability of companies to bring new and improved products to market—an objective sought by EPA—and further harm producers' ability to protect crops and compete in domestic and international markets.

We respectfully ask you to postpone the SAP until there is appropriate attention given to the scientific validity of the underlying assumptions for this dramatic change in how pesticides are regulated. Not only are there scientific questions, but only days have been given to review what the Agency has prepared and distributed to SAP members and the public.

Our organizations believe that the Agency's lack of transparency is a violation of established EPA processes for review of products under the Federal Insecticide, Fungicide & Rodenticide Act (FIFRA). Within FIFRA, EPA also is required to review the best available data. In the process involving chlorpyrifos, the Agency has fallen woefully short of statutory requirements and as stakeholders we expect a consistent and scientific approach based on the law.

We look forward to your response.

Sincerely,

Agricultural Retailers Association  
Almond Hullers & Processors Association  
American Farm Bureau Federation  
AmericanHort  
American Soybean Association  
American Society of Sugar Beet Technologists  
American Sugarbeet Growers Association  
Beet Sugar Development Foundation  
California Citrus Mutual  
California Citrus Quality Council  
California Cotton Ginners Association  
California Cotton Growers Association  
California Date Commission  
California Dried Plum Board  
California Fig Advisory Board  
California Fresh Fruit Association  
California Specialty Crops Council  
California Strawberry Commission  
California Walnut Commission  
Cranberry Institute  
CropLife America  
Florida Fruit & Vegetable Association  
Golf Course Superintendents Association of America  
National Agricultural Aviation Association  
National Association of State Departments of Agriculture  
National Association of Wheat Growers  
National Corn Growers Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Pest Management Association  
National Potato Council  
National Sorghum Producers  
North American Blueberry Council  
Northwest Horticultural Council  
Sunsweet Growers Inc.  
United Fresh Produce Association  
U.S. Apple Association  
Valley Fig Growers  
Washington Friends of Farms & Forests  
Washington State Potato Commission  
Western Agricultural Processors Association  
Western Growers Association

cc: Secretary Tom Vilsack

Jason Furman, Chairman of the Council of Economic Advisers

Jeffrey Zients, Director of the National Economic Council

Christy Goldfuss, Managing Director, White House Council on Environmental Quality

Chairman Pat Roberts

Senator Debbie Stabenow

Chairman Michael Conaway

Congressman Collin Peterson