



July 5, 2017

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Submitted via Federal eRulemaking Portal

RE: Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Synthetic Pyrethroids and Pyrethrins; Docket ID #s EPA-HQ-OPP-2010-0384, EPA-HQ-OPP-2010-0684, EPA-HQ-OPP-2012-0167, EPA-HQ-OPP-2009-0637, EPA-HQ-OPP-2009-0301, EPA-HQ-OPP-2010-0422, EPQ-HQ-OPP-2010-0479, EPA-HQ-OPP-2010-0480, EPA-HQ-OPP-2011-0039, EPA-HQ-OPP-2012-0501.

The Agricultural Retailers Association (ARA), which represents the nation's agricultural retailers and distributors, is pleased to submit comments to the U.S. Environmental Protection Agency (EPA) regarding its preliminary comparative environmental fate and ecological risk assessment for the registration review of several synthetic pyrethroids and pyrethrins.

Statement of Interest

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets. ARA members employ certified crop advisors (CCAs), qualified agronomy experts who advise farmers on the most up-to-date and effective agronomic practices. CCAs provide advice on proper pest management to avoid development of resistance or alleviate resistance problems to meet the need for improved environmental stewardship.

Comments

Pyrethroids are widely used and proven crop protection tools to control pests. In some cases, they are the only effective tool available. Pyrethroid insecticides have been safely and effectively used by America's agricultural industry since the 1970's and an important class of insecticides to the nation's farmers. These class of insecticides are used in integrated pest management (IPM) and insecticide resistance management programs. Pyrethroids are utilized by farmers on over 120 crops to control a wide range of insects that threaten agricultural production. There are very few alternative products currently available. Eliminating a farmer's ability to use pyrethroids could lead to dependence on less effective, higher cost means of control or having no options at all.



The EPA historically has followed a long-established, science-based registration process for pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) utilizing a rigorous review of all products. Under FIFRA, EPA is required to conduct a risk-benefit analysis in its regulation of pesticides. ARA is concerned that the draft Preliminary Ecological Risk Assessment (PRA) predicts high risk to certain aquatic organisms that suggest mitigation measures may be warranted. We are also concerned that the agency's PRA does not reflect the risk-benefit balancing required under FIFRA, and overstates the potential risks of pyrethroids due to its failure to account real world conditions supported by numerous scientific studies and risk mitigated using IPM practices. In addition, it does not acknowledge current EPA mandated label restrictions are already in place.

There are several examples of crops with pest threats showing the need of pyrethroids. For example, in the state of Florida there is a major battleground of invasive pests. The Asian citrus psyllid has caused a devastating citrus greening disease. Most recently the Oriental thrips has been discovered in sugarcane. It is our understanding that the University of Florida has found the pyrethroid class of insecticides as most efficacious against this pest. The California Fresh Fruit Association has provided EPA with an extensive list of fresh fruits – from table grapes, nectarines, peaches, pomegranates, and cherries - where pyrethroid insecticides provided effective and safe pest control measures.

Conclusion

ARA believes it is important for America's farmers to be able to continue to have necessary and important crop protection tools available for use. Pyrethroids are an important tool in IPM and their use helps to ensure our industry can provide safe, affordable food to a growing population. We hope EPA will weigh the numerous benefits of pyrethroid insecticides during this risk assessment process. The loss of this class of insecticides would be devastating to our ability to control invasive pests that pose major threats to many different crops. ARA believes in proper stewardship of all crop protection products, including pyrethroids, to attain sustainable crop production using proven IPM and insect resistance management practices.

ARA invites EPA to visit with our members and their farmer customers to see firsthand their own experiences of safe and effective use of this important class of insecticide products. Thank you for your review and consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Richard D. Gupton". The signature is written in a cursive style with a prominent "R" and "G".

Richard D. Gupton
Senior Vice President, Public Policy & Counsel