October X, 2023

The Honorable Debbie Stabenow The Honorable John Boozman

Chair Ranking Member

Committee on Agriculture Committee on Agriculture

U.S. Senate U.S. Senate

328A Russell Senate Office Building 328A Russell Senate Office Building

Washington, DC 20510 Washington, DC 20510

The Honorable Glenn Thompson The Honorable David Scott

Chair Ranking Member

Committee on Agriculture Committee on Agriculture

U.S. House of Representatives U.S. House of Representatives

1301 Longworth Building 1301 Longworth Building

Washington, DC 20515 Washington, DC 20515

**Re: Opposition to USDA CROP Act of 2023**

Dear Chair Stabenow, Ranking Member Boozman, Chair Thompson, Ranking Member Scott,

On behalf of our organizations and our millions of members and supporters, we write to oppose H.R. 5070 and S. 2472, the USDA Communication Regarding Oversight of Pesticides Act of 2023 (“USDA CROP Act”). This legislation would delay and undermine the enactment of critical protections for people, wildlife, and the environment from dangerous pesticides. The legislation would unwisely give the Office of Pest Management Policy (“OPMP”) a near-veto over established environmental safeguards required by the Federal Insecticide Fungicide and Rodenticide Act, the Endangered Species Act and other laws that protect human health and the environment from pesticides. The legislation would also authorize the continued sale and use of dangerous pesticides — potentially for many years — after the Environmental Protection Agency determines that such products must be removed from the market because they pose unacceptable risks to children, farmworkers, public health or the environment.

The USDA CROP Act would give the OPMP outsized influence and unwarranted deference in virtually all pesticide regulatory matters, despite the fact that in passing the law regulating pesticides — the Federal Insecticide Fungicide and Rodenticide Act (“FIFRA”) — Congress put pesticide regulation squarely within the purview of the Environmental Protection Agency. Indeed, when Congress passed FIFRA in 1972, it removed the USDA as the cabinet agency in charge of regulating pesticides after realizing the USDA had generally failed to regulate them adequately.

The USDA CROP Act serves as a one-way ratchet to delay environmental protections, not speed them. Even though nearly every action the EPA takes to regulate pesticides receives multiple comment periods, during which all stakeholders and all federal agencies may weigh in, the USDA CROP Act would give the OPMP its own special and separate comment period at the end of every process. If the OPMP simply asserts that a restriction on a pesticide would result in no “economically viable alternative” this would automatically delay the implementation of such restrictions for 18-24 months.

The USDA CROP Act would also specifically give the OPMP an unprecedented and counterproductive role allowing the office to undermine the conservation of threatened and endangered wildlife and plants facing extinction level threats from pesticides by allowing the OPMP to review and object to any conservation measures required by the expert wildlife agencies to prevent extinction. The Endangered Species Act has always required that decisions about the conservation of listed species be guided by the best available scientific information. For the first time in the fifty-year history of the Endangered Species Act, the USDA CROP Act would give an outside, third-party agency with no expertise in preventing the extinction plants and animals the ability to delay vital protections, again by up to two years.

It is important to reiterate that at every stage of the EPA’s review process for pesticides, the agency already offers a public comment period and an opportunity for all stakeholders to contribute data or science they believe is relevant to the decision-making process. Indeed, while endangered species consultations normally *do not* allow for public comment, in 2013 the EPA and the expert wildlife agencies agreed to include public comments in that process as well.[[1]](#footnote-1) USDA is well aware of this because it engages in these processes. This legislation wrongly attempts to create the impression that EPA and the expert wildlife agencies are ignoring data and refusing to allow all stakeholders a fair opportunity to comment. Every stakeholder, from states agricultural agencies, local governments, agricultural trade groups, pesticides manufacturers, and the OPMP can already provide feedback on every pesticide ecological and health risk assessment, farmworker protections requirement, and measure to protect endangered species.

Concerningly, the Office of Pest Management Policy is simply not an honest broker on best practices for controlling agricultural pests — as Congress intended — but has become an advocate for more pesticide use in virtually all circumstances. We have reviewed over 100 comment letters written by OPMP on pesticide issues from 2008 to 2023, spanning three different presidential administrations, attached as Appendix A. In each instance, the OPMP opposed efforts by the EPA to impose greater restrictions on pesticides, including highly hazardous pesticides banned by many of our trading partners, such as chlorpyrifos, paraquat, and atrazine. We were unable to find a single instance where the OPMP sought greater restrictions on the use of a pesticide compared to the EPA’s proposed actions. The OPMP unfortunately has long advocated against restrictions on pesticides, with EPA’s career staff as far back as 2006 raising concerns that they “feel besieged by political pressure exerted” by the OPMP.[[2]](#footnote-2)

It is not surprising therefore that the proponents of the USDA CROP Act seek to elevate the influence and power of the OPMP, as it generally acts as an advocate for the pesticide industry and agribusiness interests. Whether or not OPMP’s advocacy is helpful, it is worth noting that Congress *never* mandated OPMP to be an advocate for pesticides. Instead, when Congress originally authorized the OPMP in 1998, the mission given to the office was to *coordinate* pesticide and pest management policies across the government, including integrated pest management (“IPM”) policies.[[3]](#footnote-3)In particular, OPMP’s Congressional mission to further IPM initiatives, if anything, suggests that Congress hoped that OPMP would focus on ways to reduce pesticide use by facilitating “development, evaluation and delivery of alternative pest management tools.”[[4]](#footnote-4) Locking in the unfortunate mission drift that has occurred at the OPMP would effectively install a pro-pesticide champion in a position of disproportionate influence and thwart every effort to better protect human health and the environment from pesticides.

Finally, we oppose the provisions of the USDA CROP Act that unnecessarily and unilaterally delay the removal from sale of highly dangerous pesticides. The EPA very rarely cancels pesticides, and only when the risk of harm is severe. In those instances, the EPA has decided when and if it was acceptable to allow existing stocks of chemicals to continue to be sold. This legislation would override the EPA’s discretion and force pesticide products to remain on the market no matter how extreme the harm. When a pesticide manufacturer anticipates that its products may be cancelled, it can ramp up its production before the cancellation occurs. For example, in 2008, EPA issued a decision requiring enclosed containers for loose, candy-colored, and highly toxic rodenticides that were poisoning children and pets from accidental ingestion.[[5]](#footnote-5) Despite the recognized risk of poisoning, existing stocks were allowed to be sold until 2011, unnecessarily putting families at risk of fatal poisonings for another three years.[[6]](#footnote-6) Such situations should not be mandated to occur across the board, and if anything, Congressional action should create a presumption *against* the continued sale of pesticide products when they are found to be so dangerous that the EPA is forced to cancel their registration.

The USDA CROP Act only serves to delay and weaken ongoing efforts to protect children, farmworkers, public health, endangered wildlife, and the environment from some of the most dangerous pesticides. The bill hands unprecedented authority over the pesticide review process to an office that advocates for increased pesticide use and would delay the phase-out of extremely dangerous pesticides in those rare instances where EPA determines cancellation is warranted. For these reasons we ask you to oppose this legislation.

Sincerely,

**APPENDIX: ANALYSIS OF 100 COMMENT LETTERS**

|  |  |  |
| --- | --- | --- |
| **Comment ID:** | **Chemical:** | **OPMP Position:** |
| EPA-HQ-OPP-2012-0330-0080 | 2,4-D | OPMP opposes EPA’s ecological risk assessment on nontarget plants and both listed and non-listed wildlife as well as aquatic exposure models as basis for environmental protections. |
| EPA-HQ-OPP-2013-0726-0026 | 2,4-DP-p | OPMP opposes stronger drift mitigation measures and doubts EPA’s toxicity concerns for bees and pollinators. |
| EPA-HQ-OPP-2015-0203-0020 | Acequinocyl | OPMP opposes risk assessments for aquatic invertebrates, birds, and bees and does not recommend phase-outs for higher risk alternatives. |
| EPA-HQ-OPP-2012-0329-0047 | Acetemiprid | OPMP rejects this neonicotinoid’s recognized toxicity to bees and risk to aquatic and terrestrial invertebrates in opposition to protective measures. |
| EPA-HQ-OPP-2016-0416-0020 | Afidopyropen | OPMP supports expanded use of this new insecticide and unconditional registration for outdoor and food crop uses. |
| EPA-HQ-OPP-2022-0133-0034 | Agricultural Worker Protection Standards | OPMP opposes proposed pesticide exclusion zones to prevent accidental and common off-field pesticide exposure. |
| EPA-HQ-OPP-2012-0161-0097 | Aldicarb | OPMP supports continued registration of aldicarb without any additional protections. |
| EPA-HQ-OPP-2020-0600-0048 | Aldicarb | OPMP supports renewed use of this pesticide previously cancelled after EPA found unacceptable risks to infants and children. |
| EPA-HQ-OPP-2016-0039-0017 | Aliphatic Solvents | OPMP opposes EPA risk assessments and harm identification of oiling of wildlife eggs and pollinator deaths associated with these chemicals. OPMP supports registration despite recognizing risk to aquatic species. |
| EPA-HQ-OPP-2015-0480-0010 | Antimycin A | OPMP supports ecological risk assessment that downplays harms to birds and mammals and ignores lethality to endangered fish and amphibians. |
| EPA-HQ-OPP-2010-0783-0030 | Asulam | OPMP supports increased use of this pesticide without comment on health or ecological risk assessments. |
| EPA-HQ-OPP-2013-0266-1761 | Atrazine | OPMP opposes EPA mitigations to protect aquatic plants and people from atrazine in water and specifically opposes protections against aerial application, record-keeping requirements, and runoff measures. |
| EPA-HQ-OPP-2013-0266-0826 | Atrazine, Simazine and Propazine | OPMP supports unconditional registration and increased use of triazine herbicides without comment on ecological and health effects. |
| EPA-HQ-OPP-2011-0691-0010 | Aviglycine Hydrochloride | OPMP supports re-registration and approval of 1970s pesticide and asks for no additional data or label changes. |
| EPA-HQ-OPP-2015-0702-0007 | Bacteriophages | OPMP supports the continued use of these microbial biopesticides. |
| EPA-HQ-OPP-2011-0931-0046 | Benfluralin | OPMP supports use but does not comment on the human health or ecological risks, nor does it note any economic benefits of the pesticide. |
| EPA-HQ-OPP-2011-0483-0046 | Benzoate | OPMP comments on ecological risk assessment attempts to resolve EPA uncertainties with unpublished draft data that favors increased use. |
| EPA-HQ-OPP-2015-0535-0015 | Bromuconazole | OPMP supports continued use and tank-mixing without restriction. |
| EPA-HQ-OPP-2011-0720-0033 | Butralin | OPMP opposes ecological risk assessments that recognize harms to endangered mammals while opposing data collection efforts on potential pollinator harms. |
| EPA-HQ-OPP-2004-0124-0045 | Carboxin and Oxycarboxin | OPMP opposes EPA’s assumptions on risk from seed treatment to birds and mammals as well as exposure assumptions for greenhouse and nursery workers. |
| EPA-HQ-OPP-2010-0815-0033 | Carfentrazone-ethyl | OPMP supports interim registration and opposes spray-drift, droplet size, and ground-boom measures meant to reduce off-target exposure. |
| EPA-HQ-OPP-2010-0815-0025 | Carfentrazone-ethyl | OPMP opposes ecological risk assessment as too conservative, despite recognized risks of harm, and supports use justified by economic concerns. |
| EPA-HQ-OPP-2015-0653-0648 | Chlorpyrifos | OPMP opposes revocation of highly toxic chlopyrifos and questions the validity peer-reviewed research on harms to children. |
| EPA-HQ-OPP-2008-0850-1101 | Chlorpyrifos | OPMP supports continued use of chlopyrifos and opposes EPA’s consideration of additional safety factors to protect children. |
| EPA-HQ-OPP-2013-0153-0051 | Chorpicrin | OPMP supports continued use of this fumigant (which was used as a tear-gas in WWI) and purports it is necessary as part of IPM. |
| EPA-HQ-OPP-2012-0424-0032 | Clodinafop-propargyl | OPMP opposes spray drift management language meant to protect people, crops, and wildlife from off-target application. |
| EPA-HQ-OPP-2014-0167-0033 | Clopyralid | OPMP opposes re-entry intervals based on severe eye irritation that occurs with recent exposure, citing hardship for industry, while also opposing ecological risk assessments finding chronic effects to mammals. |
| EPA-HQ-OPP-2010-0212-0043 | Copper sulfate | OPMP supports continued use of copper sulfate and attempts to rebut toxicity risks identified by EPA to fish, aquatic invertebrates, birds, mammals, and amphibians. |
| EPA-HQ-OPP-2008-0023-0084 | Coumaphos | OPMP supports continued use of organophosphate classified as extremely hazardous and request expanded application in animal feeding operations. |
| EPA-HQ-OPP- 2011-0668-0063 | Cyantraniliprole | OPMP opposes EPA’s finding that use of the bee-toxic insecticide is likely to jeopardize listed species, casting doubt and calling for a different analysis. |
| EPA-HQ-OPP-2008-0351-0100 | Diazinon | OPMP opposes use of safety factors meant to protect children from harmful pesticide exposures, claiming that safety measures will limit organophosphate usage in IPM. |
| EPA-HQ-OPP-2016-0187-0839 | Dicamba | OPMP opposes safety measures to protect people and non-target plants from dicamba drift and synergistic effects. |
| EPA-HQ-OPP-2011-0911-0025 | Diflufenzopyr and Diflufenzopyr-sodium | OPMP supports registration of pesticide mixed with dicamba and opposes drift mitigations as confusing. |
| EPA-HQ-OPP-2015-0749-0018 | Diphenylamine | OPMP supports continued registration and asks for retained tolerances in pears. |
| EPA-HQ-OPP-2013-0750-0065 | Dithiopyr | OPMP opposes ecological and human health risks assessments that identify risk to drinking water and harms to plants and mammals, despite recognizing that this chemical is not a “zero risk” option. |
| EPA-HQ-OPP-2015-0077-0122 | Diuron | OPMP opposes cancer risk thresholds, argues that they must be lowered, and finally asks for a delay in implementing safety measures until new cancer studies are completed. |
| EPA-HQ-OPP-2013-0524-0017 | DRA 2-phenylphenol and Salts (OPP and SOPP) | OPMP opposes use of closed-system packinghouses as too costly, despite acknowledging workplace exposure dangers. |
| EPA-HQ-OPP-2014-0414-0061 | Entridiazole | OPMP supports removing time limits on pesticide handling meant to protect works, as well as human health conclusions that downplay cancer risk. |
| EPA-HQ-OPP-2009-0301-0126 | Esfenvalerate | OPMP supports interim decision and continued use of pyrethroid with known risk to endangered wildlife that imposes minimal protective measures but does oppose droplet size and drift mitigations measures. |
| EPA-HQ-OPP-2011-0094-0023 | Ethalfluralin | OPMP supports continued use of this possible human carcinogen and provides only comments on economic benefits of the pesticide. |
| EPA-HQ-OPP-2013-0244-0030 | Ethylene Oxide | OPMP opposes all mitigation measures meant to protect people, despite extreme dangers and cancer associated with this chemical. |
| EPA-HQ-OPP-2014-0133-0036 | Etoxazole | OPMP support continued use citing IPM uses while opposing EPA drift reduction measures meant to protect people and the environment. |
| EPA-HQ-OPP-2010-0422-0105 | Fenpropathrin | OPMP supports continued use and label changes the mention toxicity to bees but not towards endangered non-target wildlife. Claims this synthetic pyrethroid will replace organophosphates but does not recommend reductions. |
| EPA-HQ-OPP-2010-0863-0027 | Flufenacet | OPMP opposes the proposed advisory statement for commercial agricultural products |
| EPA-HQ-OPP-2018-0551-0025 | Fluindapyr | OPMP support expanded use and opposes drift reduction language |
| EPA-HQ-OPP-2009-0084-0024 | Fluminclorac-pentyl | OPMP supports removing restrictions on wind speed limits in application meant to control pesticide drift and protect people and non-target crops and wildlife |
| EPA-HQ-OPP-2011-0176-0078 | Flumioxazin | OPMP opposes language meant to reduce pesticide drift that requires coarse droplet sizes. |
| EPA-HQ-OPP-2009-0160-0072 | Fluridone | OPMP opposes ecological risk assessment and supports expanded use. |
| EPA-HQ-OPP-2006-0239-0190 | Fomasafen | OPMP opposes limits to application during high winds to prevent drift. |
| EPA-HQ-OPP-2008-0190-0051 | Glufosinate-Ammonium | OPMP supports expanded use of this pesticide that has been withdrawn from the French market due to its classification as a possible reprotoxic chemical. |
| EPA-HQ-OPP-2014-0224-0029 | Imazaquin | OPMP opposes spray drift protections and droplet size requirements meant to reduce harms from this pesticide. |
| EPA-HQ-OPP-2008-0844-1249 | Imidacloprid | Saying nothing of the harm this class of pesticides presents to pollinators, OPMP notes imidacloprid is still "a critical pesticide" |
| EPA-HQ-OPP-2013-0367-0051 | Indoxacarb | OPMP supports continued use with weak human health and environmental protections. |
| EPA-HQ-OPP-2013-0367-0035 | Indoxacarb | OPMP supports EPA’s use of a weakened human health risk assessment in light of economic benefits of the crop. |
| EPA-HQ-OPP-2013-0367-0053 | Indoxacarb | OPMP offers supplemental comments opposing language meant to mitigate drift risk from air blast application. |
| EPA-HQ-OPP-2016-0519-0029 | Kasugamycin | OPMP supports new and expanded uses of this pesticide and claims it is necessary for IPM programs. |
| EPA-HQ-OPP-2009-0317-0115 | Malathion | OPMP opposes using epidemiological studies that assess human health impacts as a justification for greater restrictions on the organophosphate malathion. |
| EPA-HQ-OPP-2014-0194-0029 | Malathion | OPMP opposes tolerance modifications for malathion meant to protect people from pesticide residues, citing international trade as a justification. |
| EPA-HQ-OPP-2021-0231-0006 | Malathion | OPMP opposes many of the conclusions of a Biological Opinion, opposes minimal measures to protect endangered species, and calls for consultation with the pesticide industry. |
| EPA-HQ-OPP-2016-0417-0026 | Metaflumizone | OPMP supports continued use of this pesticide despite associated increases of autoimmune disorders associated with this pesticide given its use in IPM programs |
| EPA-HQ-OPP-2009-0510-0007 | Metarhizium anisopliae | OPMP supports EPA not requiring additional data on human health risks. |
| EPA-HQ-OPP-2010-0278-0024 | Methiocarb | This highly toxic pesticide was withdrawn in the EU, but OPMP supports expanded use of this highly toxic pesticide already banned in the EU, arguing that it is needed in IPM and that it is needed to protect listed species from crows. |
| EPA-HQ-OPP-2011-0678-0011 | Methyl Anthranilate | OPMP supports expand use of this pesticide without any additional data or label changes citing its importance in IPM. |
| EPA-HQ-OPP-2016-0173-0008 | Methyl Eugenol | OPMP supports expanded use and argues that this pesticide would not harm endangered wildlife and should be registered without restriction. |
| EPA-HQ-OPP-2016-0173-0004 | Methyl Eugenol | OPMP supports decision to waive toxicity studies on identified fish, aquatic invertebrates, and terrestrial plant species. |
| EPA-HQ-OPP-2011-0190-0009 | N6-Benzyladenine | OPMP supports use and interim registration of this pesticide with no label changes or risk assessments concerns. |
| EPA-HQ-OPP-2015-0285-0022 | Nine ALS-inhibiting herbicides | OPMP supports continued use and expedited human health and ecological risk assessment for this group of herbicides. |
| EPA-HQ-OPP-2018-0096-0011 | Ningnanmycin | OPMP supports approval of new pesticide use and claims it can become a tool in IPM systems and organic production. |
| EPA-HQ-OPP-2015-0820-0022 | Oxytertracycline | OPMP supports new use of antibiotic on citrus despite resistance concerns and host of options available to citrus growers. |
| EPA-HQ-OPP-2011-0855-0106 | Paraquat | OPMP opposes mitigations to reduce paraquat exposure to workers and bystanders, including measures to require application of the extremely dangerous pesticide by certified applicators only. |
| EPA-HQ-OPP-2012-0219-0031 | Pendimethalin | OPMP supports continued use despite risks of pancreatic cancer and opposes spray drift protections calling for an industry task force which would ultimately weaken protections. |
| EPA-HQ-OPP-2016-0488-0003 | Phosphorous Acids and Salts | OPMP supports continued use with no mitigations. |
| EPA-HQ-OPP-2017-0653-0019 | Picarbutrazox | OPMP supports continued use as necessary to combat resistance and opposes spray drift protection measures. |
| EPA-HQ-OPP-2012-0870-0027 | Prohexadione Calcium | OPMP supports these pesticides use over non-chemical alternatives used to deter growth such as pruning and opposes ecological risks assessments finding toxic exposure to mammals. |
| EPA-HQ-OPP-2015-0095-0017 | Propoxycarbazone-sodium | OPMP opposes spray drift reduction measures and resistance management principals in favor of letter growers decide safe limits. |
| EPA-HQ-OPP-2017-0336-0015 | Pseudomonas fluorescens strain ACK55 | OPMP supports use of this bacterium even where data is inconclusive and agrees that use will not harm any endangered wildlife. |
| EPA-HQ-OPP-2020-0226-0004 | Pyraziflumid | OPMP "fully supports" as a "valuable SDHI tool in the fungicide toolbox" |
| EPA-HQ-OPP-2017-0432-0017 | Pyridate | OPMP supports continued use of this pesticide and appreciated that ecological reviews eventually minimized risk even where chronic risk to some taxa were apparent. |
| EPA-HQ-OPP-2019-0380-0008 | Pyrimethanil | OPMP opposes EPA’s conclusions finding weight reduction in fish and reproductive risks for birds, providing no data to support their position. |
| EPA-HQ-OPP-2011-0677-0063 | Pyriproxyfen | OPMP supports continued use but opposes spray drift protection measures. |
| EPA-HQ-OPP-2011-0677-0029 | Pyriproxyfen | OPMP supports continued use claiming the pesticide is necessary for IPM. |
| EPA-HQ-OPP-2011-0661-0033 | Pyrithiobac-sodium | OPMP supports continued use regardless of resistance concerns, noting that any future mitigations to address ecological risk should not affect use of this pesticide. |
| EPA-HQ-OPP-2013-0771-0030 | Quinoxyfen | OPMP supports continued use and opposes spray drift mitigations measures. |
| EPA-HQ-OPP-2013-0771-0028 | Quinoxyfen | OPMP supports use despite ecological risks including toxicity to fish and ability to bioaccumulate. |
| EPA-HQ-OPP-2011-0667-0077 | Spinetoram and Spinosad | OPMP opposes spray drift mitigation measures including mitigations that prevent use in high winds. |
| EPA-HQ-OPP-2011-0666-0041 | Spinetoram and Spinosad | OPMP opposes EPA’s risk assessment as too conservative, calling for its adjustment despite high risks to terrestrial and aquatic wildlife as well as honey bees and pollinators. |
| EPA-HQ-OPP-2011-0696-0021 | Starlicide | OPMP supports continued use of this pesticide without mitigations, despite risk to non-target birds and endangered species. |
| EPA-HQ-OPP-2015-0754-0009 | Strychnine | OPMP supports continued use of this rodenticide despite risk to the endangered San Joaquin Kit Fox. |
| EPA-HQ-OPP-2012-0501-0071 | Tefluthrin | OPMP supports weakening of a reduction in safety factors meant to protect children from pyrethroids as well as weakened ecological risk characterizations. |
| EPA-HQ-OPP-2016-0063-0035 | Tembotrione | OPMP supports use as an alternative to atrazine, opposes ecological risk assessments finding harm to aquatic species and small mammals, and urges EPA not to consider aerial application data in risk assessment. |
| EPA-HQ-OPP-2012-0329-0140 | Thiamethoxam and Clothianidin | OPMP strongly opposes inclusion of pollinator statement necessary to prevent harms from these neonicotinoid insecticides, opposes drift mitigation language, opposes crop-specific proposals, and calls for raising neonicotinoid tolerances on food crops. |
| EPA-HQ-OPP-2011-0581-0325 | Thiamethoxam and Clothianidin | OPMP supports uses claiming critical for IPM, and casts doubt on EPA risk assessments to aquatic invertebrates and birds while saying almost nothing about extreme risk to bees and pollinators. |
| EPA-HQ-OPP-2016-0581-0013 | Transfluthrin | OPMP supports unconditional registration of this new insecticide. |
| EPA-HQ-OPP-2016-0114-0018 | Triadimefon | OPMP supports continued use of this fungicide citing cotton-industry research. |
| EPA-HQ-OPP-2013-0250-0080 | Trianzines | OPMP opposes EPA’s human health risk assessment on atrazine and urges the EPA to abandon assumptions related to drinking water protections in an attempt to justify increased applications of this chemical. |
| EPA-HQ-OPP-2014-0576-0059 | Triclopyr | OPMP supports continued use and opposes proposed restrictions to minimize risk from contamination of manure and composts. |
| EPA-HQ-OPP-2013-0074-0042 | Trifloxystrobin | OPMP opposes drift protection language and masking requirements for workers applying seed treatments citing cost. |
| EPA-HQ-OPP-2018-0762-0023 | Trifludimoxazin | OPMP supports continued use of the herbicide that was eventually pulled from the market given high risks to wildlife, including fish and plants, risk that OPMP cites as too conservative. Opposes spray drift management language. |
| EPA-HQ-OPP-2012-0417-0040 | Trifluralin | OPMP supports weakening label language on soil incorporation meant to reduce risk to wildlife despite recognizing potential dangers. |
| EPA-HQ-OPP-2023-0327-0001 | Vulnerable Species Pilot Project | OPMP opposes EPA’s efforts to protect endangered wildlife across the country through a pilot project and improperly argues for cost considerations in endangered species protections. |

1. See, *Enhancing Stakeholder Input in the Pesticide Registration Review and ESA Consultation Processes and Development of Economically and Technologically Feasible Reasonable and Prudent Alternatives*, available at: <https://archive.epa.gov/pesticides/news/web/pdf/regreview-esa.pdf> [↑](#footnote-ref-1)
2. Letter to Stephen L. Johnson, Administrator, Environmental Protection Agency from Local Presidents of EPA Unions (May 24, 2006) https://downloads.regulations.gov/EPA-HQ-OPP-2004-0292-0010/attachment\_3.pdf [↑](#footnote-ref-2)
3. “Office of Pest Management Policy is necessary to focus and coordinate the many pest management and pesticide-related activities carried out within the Department.” H. Rept. 105-492 (Apr. 2, 1998) [↑](#footnote-ref-3)
4. H. Rept. 105-492 (Apr. 2, 1998). [↑](#footnote-ref-4)
5. Rodenticides Final Risk Mitigation Decision; Notice of Availability 73 Fed. Reg. 31868 (June 4, 2008). [↑](#footnote-ref-5)
6. Rodenticides; Product Cancellation Order; 74 Fed. Reg. 50194 (Sept. 30, 2009). [↑](#footnote-ref-6)