

November 23, 2015

Mr. Jack Housenger
Director
Office of Pesticide Programs (7501P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Sent via email: housenger.jack@epa.gov

Re: Request that EPA Provide Separate Notice and Opportunity for Comment Concerning Its Blanket FQPA Determination for OP Pesticides

Dear Mr. Housenger:

The following organizations, representing a broad cross section of American agriculture and farming, respectfully request a separate comment period on the FQPA 10X practice that has been introduced into new aspects of EPA decision making on various pesticide products, including its recent Blanket FQPA Determination on organophosphate pesticides (OP) in the Agency's Chlorpyrifos-Methyl: Human Health *Draft* Risk Assessment (DRA) for Registration Review (dated September 15, 2015). EPA-HQ-OPP-2010- 0119.

We believe this additional burden is unnecessary, unreasonable, and unwarranted – especially when there has been no opportunity to comment on what constitutes a major underlying policy change. Not only would the Blanket FQPA Determination for OP pesticides constitute a dramatic shift in policy, we are concerned that this will have harmful effects on the continued registration of these pesticides. The change presents an extraordinarily high standard to meet, casts doubt on crop protection products, and threatens the ability of our growers to have proven valuable pest control tools available to them. We are interested in knowing the justification for EPA's 10X standard, from a scientific basis, and why EPA has not shared this approach for review by farmers and other interested stakeholders. If allowed to continue, the new standard places a substantial burden on pesticide registrations without improvements to the environment or human health.

Since the inclusion of this standard constitutes a major policy shift and affects multiple molecules, in addition to the seven OPs listed, we believe there needs to be a much more transparent mechanism for engaging stakeholders. Placing such an important notice in the dockets for only these OPs left many stakeholders who had limited interest in these particular molecules, but who will be severely impacted, unaware of this new approach. For this reason, we request a separate comment period specifically devoted to the new standard.

Overall, we are extremely concerned that EPA may not be following its own framework for reviewing pesticides and crop protection products. This move to disregard toxicity studies generated under Agency requirements and guidelines in favor of unproven, hazard-based assumptions has harmful implications for food and agricultural production in the United States. This jeopardizes our ability to influence foreign trade partners away from defensive science in their reviews of effective agriculture tools.

We appreciate the opportunity to comment, and look forward to hearing from you.

Sincerely,

American Farm Bureau Federation
AmericanHort
Almond Hullers & Processors Association
Agricultural Retailers Association
American Society of Sugar Beet Technologists
American Soybean Association
American Sugarbeet Growers Association
Beet Sugar Development Foundation
California Citrus Mutual
California Cotton Ginners Association
California Cotton Growers Association
California Dried Plum Board
California Specialty Crops Council
California Walnut Commission
Cherry Marketing Institute
Florida Fresh Fruit & Vegetable Association
National Agricultural Aviation Association
National Corn Growers Association
National Cotton Council
National Potato Council
Society of American Florists
United Fresh Produce Association
U.S. Apple Association
Western Agricultural Processors Association
Western Growers Association