



Arizona Farm Bureau Federation

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September 23, 2022

Submitted electronically via the Federal eRulemaking Portal at <https://www.regulations.gov>

RE: EPA-HQ-OPP-2022-0490; Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses: Notice of Filing

To Whom It May Concern:

The Arizona Farm Bureau represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion in economic impact to the state. Many of our members rely on a number of the organophosphates as a crop protection tool to produce high quality crops and sustain their operations. Our comments below address the petition filed with the EPA requesting the revocation of tolerances and registration cancellation for several organophosphates (OPs).

In EPA's notice (EPA-HQ-OPP-2022-0490) the Agency acknowledges there are currently 20 organophosphates in the registration review process and that on December 2, 2021 they updated the schedule for registration review for the cases for which the interim registration review decision will be issued after October 2022. Notably, a number of the OPs listed in the petition will be issued after October 2022. The petitioners are seeking the revocation of tolerances and registration cancellation for the listed OPs, in addition to a number of other requests, be completed by EPA by October 1, 2022, which is unrealistic. We urge EPA to reject the petition which would revoke tolerances or cancel registrations for OPs listed in the petition.

EPA has an obligation under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to conduct registration reviews of pesticides at least every 15 years to evaluate their effects to human health and the environment as new information and data becomes available. It is critical that EPA adhere to the registration review process that is based on science and allows the agency to work through the timeline they have put in place. This process allows stakeholders to participate in the registration review process to review the data and studies used in the human health and environmental risk assessments and the proposed interim decisions and provide feedback to EPA as appropriate.

Furthermore, FIFRA allows EPA to register pesticides so long as they will not generally cause unreasonable adverse effects to humans or the environment. EPA also recognizes that FIFRA, unlike other environmental statutes administered by the Agency, requires EPA to balance these risks and benefits in the pesticide decision making process by taking into account the economic, social and

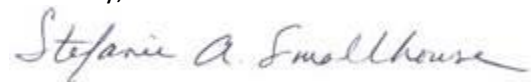
environmental costs and benefits of the use of any pesticide.¹ Before any OP tolerances are revoked or registrations cancelled, EPA must consider the risks and benefits of such action.

While many previously common uses of organophosphates have been greatly reduced or eliminated as newer chemistries have become available, there are several scenarios for which growers still rely on the unique properties of these chemistries for effective pest control. A number of the OPs listed in the petition are important to crop production in Arizona including acephate, bensulide, diazinon, dimethoate, malathion, naled, phorate, and tribufos. The Arizona Farm Bureau has previously submitted comments to EPA on the use of acephate noting its use and benefits to Arizona crop production and intends to provide comments on the other organophosphates as they make their way through the registration review process.

We urge EPA to adhere to its schedule for registration reviews, which includes the OPs listed in the petition, as updated on December 2, 2021. If there is a need to take action on a particular pesticide outside of its registration review status, the decision should be based on the best available and sound science and made through the proper regulatory process as set forth by FIFRA.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

¹ Environmental Protection Agency. Office of Pesticide Programs. Environmental Fact Sheet. Risk/Benefit Balancing Under the Federal Insecticide, Fungicide, and Rodenticide Act. February 1990.