



Arizona Farm Bureau Federation

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Gilbert, AZ 85296

January 5, 2016

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC)
(28221T)

1200 Pennsylvania Ave. NW.
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OPP-2015-0653; Tolerance Revocations: Chlorpyrifos

To Whom It May Concern:

The Arizona Farm Bureau represents farmers and ranchers from all across the state of Arizona. Our members produce an array of crops and livestock that contribute over \$17 billion of economic impact to the state. Many of our members utilize pesticides regulated under the Federal Insecticide, Fungicide and Rodenticide Act and would be impacted by the proposal to revoke all tolerances for chlorpyrifos.

According to officials at the Arizona Department of Agriculture approximately 30,000 acres in the state were treated with chlorpyrifos this past year. The crops treated were alfalfa (22,000), cotton, (3,500), sorghum (1,100), and pecans (1,800). Although the number of total acres treated may seem small, it highlights the fact that chlorpyrifos is an important crop protection tool. Revoking its tolerance and ultimately its use would result in one less tool available to Arizona farmers. There are times when a particular pest gets out of control and farmers need a product like chlorpyrifos with broad spectrum control, to significantly reduce the pest population. Weather can be a key determinant in determining how severe pest problems will be from year to year. As we experience more extreme weather fluctuations, it is even more important to ensure chlorpyrifos is available to deal with pest problems effectively and efficiently.

Thus in Arizona alone tolerances for chlorpyrifos are needed for alfalfa, cotton, sorghum and pecans. Additionally the tolerances associated with the goods produced from these commodities should also be retained.

As a member of the American Farm Bureau Federation, we support the comments they have submitted to this docket and wish to emphasize the following points:

- The EPA's proposal appears to be a retreat from its statutory obligation that, when evaluating pesticides for registration, it balance the risk of those active ingredients against their benefits to farmers specifically and to the public generally when they do not pose an unreasonable risk to health or the environment.

- The agency appears to be proceeding in a manner based on modeling assessments that are highly questionable and linking its reasoning to epidemiological studies that are not transparent and do not accurately represent the risk of chlorpyrifos. In doing so, we believe the EPA has stepped well beyond its statutory authority and is reaching conclusions not justified either by the science or the law.
- Were chlorpyrifos to be eliminated or severely restricted, the impact to farmers would be significant in terms of reduced efficacy of pest management programs, increased costs to growers switching to more expensive, more frequently applied and less effective alternatives, disruption to current and historical integrated pest management programs across these cropping systems and potentially substantial losses due to reduced crop yield.

The EPA should rely on rigorous, science-based, and transparent regulatory processes of assessing the potential human health risk of chlorpyrifos. The Federal Insecticide, Fungicide and Rodenticide Act, Federal Food, Drug, and Cosmetic Act, and Food Quality Protection Act all demand no less. Considering the deficiencies in the assessment, methodology and transparency we do not support a tolerance revocation of chlorpyrifos and reiterate the importance of this product for farmers.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Rogers", written in a cursive style.

Kevin Rogers, President
Arizona Farm Bureau Federation