

September 15, 2020

Dear Representative:

We write to share our support of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and our opposition to the Protect America's Children from Toxic Pesticides Act of 2020 (H.R. 7940, S. 4406) which misrepresents the science-based safety standards that are used to protect farmers, workers and the public. We represent a wide range of groups who rely on the availability of safe and effective pesticides in diverse settings to produce America's food and specialty crops, fiber, and biofuel and to protect our public health and infrastructure.

FIFRA has been amended by Congress on several occasions to strengthen the regulatory standard for safety – most recently by the Food Quality Protection Act (FQPA) that added specific protections for infants and children. FIFRA provides for federal regulation of pesticide distribution, sale, and use and establishes stringent safety standards and oversight. All pesticides distributed or sold in the United States must be registered by the U.S. Environmental Protection Agency (EPA), and then reregistered every fifteen years. EPA is required to review the most current scientific data on health and environmental impacts for all pesticide products, and impose requirements to minimize any risks, before they are made available for sale and use. The data must show that products work as intended and can be used safely. Product label restrictions and instructions are designed to ensure a product is used effectively and safely in a manner that mitigates any identified risks. FIFRA already requires EPA to consider economic, social, and environmental benefits *and* risks, and FQPA added special considerations for risks to infants and children, when determining if a product can be registered. While reregistration is required to occur at least every fifteen years, it can and often does occur more frequently. EPA can initiate a review if scientific data becomes available that questions the safety of a product. For example, some of the organophosphate products specifically mentioned in H.R. 7940 and S. 4406 have undergone multiple EPA risk assessments since 1996.

Instead, the legislation as introduced would gut decades of federal regulation and scientific progress, undermining the work of EPA's career scientists in the evaluation of pesticide safety and oversight of pesticide registration and use. The bills would jeopardize the continued availability and innovation of pesticide products by imposing an unscientific and unbalanced process that could unnecessarily remove pest control options from those who need them to safely grow crops, protect homes and infrastructure, control pathogens and disease vectors, and maintain green spaces such as parks and golf courses.

Pesticide manufacturers, pesticide users, and the public all have an interest in ensuring that the pesticide regulatory process imposes stringent regulatory controls on pesticide use based on the principles of sound science, transparency, and broad stakeholder engagement. We remain committed to protecting human health and the environment while maintaining America's important food, fiber, and biofuel production and protecting its public health and infrastructure. If we can provide additional information or answer questions useful towards meeting these goals, please know our member organizations would be happy to provide more detail.

Sincerely,

Agribusiness Association of Iowa
Agribusiness Council of Indiana
Agricultural Retailers Association
Alabama Agribusiness Council
Alabama Cotton Commission
Alabama Farmers Federation
Alabama Golf Course Superintendents Association
Alabama Nursery and Landscape Association
Alabama Pest Control Association
Alabama Turfgrass Association
Alabama Vegetation Management Society
Almond Alliance of California
American Chemistry Council's Center for Biocide Chemistries
American Farm Bureau Federation
American Mosquito Control Association
American Seed Trade Association
American Soybean Association
AmericanHort
Animal Health Institute
Aquatic Ecosystem Restoration Foundation
Aquatic Plant Management Society
Arizona Cotton Growers
Arizona Crop Protection Association
Arizona Farm Bureau Federation
Arizona Nursery Association
Arizona Pest Professional Organization
Arkansas Crop Protection Association
Arkansas Rice Growers Association
Arkansas Soybean Association
Associated Landscape Contractors of Colorado
Association of Equipment Manufacturers
Biological Products Industry Alliance
Biotechnology Innovation Organization
Bluegrass Golf Course Superintendents Association
Cactus and Pine Golf Course Superintendents Association of Arizona
California Citrus Mutual
California Cotton Ginners and Growers Association
California Fresh Fruit Association
California Golf Course Owners Association
California Golf Course Superintendents Association
California Leafy Greens Research Board

California Specialty Crops Council
Calusa Golf Course Superintendents Association
Carolinas Golf Course Superintendents Association
Central Florida Golf Course Superintendents Association
Central Ohio Golf Course Superintendents Association
Central Pennsylvania Golf Course Superintendents Association
Central Texas Golf Course Superintendents Association
Cherry Marketing Institute
Chicagoland Association of Golf Course Superintendents
Cincinnati Golf Course Superintendents Association
Colorado Association of Conservation Districts
Colorado Association of Wheat Growers
Colorado Cattlemen's Association
Colorado Farm Bureau
Colorado Nursery and Greenhouse Association
Colorado Pest Control Association
Colorado Potato Legislative Committee
Colorado Professional Beekeepers Association
Colorado Wool Growers Association
Connecticut Association of Golf Course Superintendents
Connecticut Environmental Council
Connecticut Pest Control Association
Cotton and Grain Producers of the Lower Rio Grande Valley, Inc.
Cotton Producers of Missouri
Council of Producers and Distributors of Agrotechnology
CropLife America
Delaware Farm Bureau
Delaware Maryland Agribusiness Association
Delaware Nursery and Landscape Association
Delta Council
Everglades Golf Course Superintendents Association
Exotic Wildlife Association
Florida Farm Bureau
Florida Fertilizer and Agrichemical Association
Florida Golf Course Superintendents Association
Florida Mosquito Control Association
Florida Nursery, Growers and Landscape Association
Florida Pest Management Association
Florida West Coast Golf Course Superintendents Association
Georgia Agribusiness Council
Georgia Cotton Commission
Georgia Farm Bureau
Georgia Fruit and Vegetable Growers Association
Georgia Golf Course Superintendents Association

Georgia Golf Environmental Foundation
Georgia Green Industry Association
Georgia Pest Control Association
Georgia Urban Ag Council
Golf Course Superintendents Association of America
Golf Course Superintendents Association of Arkansas
Golf Course Superintendents Association of Central California
Golf Course Superintendents Association of New England
Golf Course Superintendents Association of New Jersey
Golf Course Superintendents Association of New York
Golf Course Superintendents Association of Northern California
Golf Course Superintendents Association of South Dakota
GreenCO
Gulf Coast Golf Course Superintendents Association
Hawaii Golf Course Superintendents Association
Heart of America Golf Course Superintendents Association
Hi-Lo Desert Golf Course Superintendents Association
Hudson Valley Golf Course Superintendents Association
Idaho Golf Course Superintendents Association
Idaho Nursery and Landscape Association
Idaho Pest Management Association
Idaho Potato Commission
Illinois Farm Bureau
Illinois Green Industry Association
Illinois Landscape Contractors Association
Illinois Pest Control Association
Illinois Soybean Growers
Indiana Farm Bureau
Indiana Golf Course Superintendents Association
Indiana Soybean Alliance
Indiana Vector Control Association
Industry Task Force II on 2,4-D Research Data
Inland Empire Golf Course Superintendents Association
Iowa Golf Course Superintendents Association
Iowa Nursery and Landscape Association
Iowa Soybean Association
ISSA, The Worldwide Cleaning Industry Association
Kansas Agribusiness Retailers Association
Kansas Cotton Association
Kansas Golf Course Superintendents Association
Kansas Grain and Feed Association
Kansas Pest Control Association
Kansas Soybean Association
Kentuckiana Golf Course Superintendents Association

Kentucky Farm Bureau
Kentucky Pest Management Association
Lone Star Golf Course Superintendents Association
Long Island Golf Course Superintendents Association
Longmont Conservation District
Louisiana Cotton and Grain Association
Louisiana Farm Bureau Federation
Louisiana Pest Management Association
Louisiana-Mississippi Golf Course Superintendents Association
Maine Golf Course Superintendents Association
Maine Landscape and Nursery Association
Maryland Nursery, Landscape, and Greenhouse Association
Maryland State Pest Control Association
Massachusetts Nursery and Landscape Association
Metropolitan Golf Course Superintendents Association
Miami Valley Golf Course Superintendents Association
Michiana Golf Course Superintendents Association
Michigan Nursery and Landscape Association
Michigan Pest Management Association
Michigan Soybean Association
Mid-Atlantic Association of Golf Course Superintendents
Mid-Atlantic Soybean Association
Midwest Association of GCS
Minnesota Agri-Growth
Minnesota Crop Production Retailers
Minnesota Farm Bureau
Minnesota Golf Course Superintendents Association
Minnesota Nursery and Landscape Association
Minnesota Soybean Growers
Mississippi Farm Bureau
Missouri Farm Bureau
Missouri Soybean Association
Montana Mosquito and Vector Control Association
Mosquito and Vector Control Association of California
National Agricultural Aviation Association
National Alliance of Independent Crop Consultants
National Association of Landscape Professionals
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Barley Growers Association
National Christmas Tree Association
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives

National Farmers Union
National Golf Course Owners Association of Arizona
National Onion Association
National Pest Management Association
National Potato Council
National Roadside Vegetation Management Association
National Sorghum Producers
National Sunflower Association
Nebraska Golf Course Superintendents Association
Nebraska Soybean Association
Nevada Golf Course Owners Association
New England Pest Management Association
New Hampshire Golf Course Superintendents Association
New Jersey Green Industry council
New Jersey Landscape Contractors Association
New Jersey Nursery and Landscape Association
New Jersey Pest Management Association
New Mexico Farm and Livestock Bureau
New Mexico Pecos Valley Farmers
New Mexico Pest Management Association
New York Corn & Soybean Growers Association
New York Farm Bureau
New York Pest Management Association
New York State Agribusiness Association
New York State Flower Industries
New York State Turfgrass Association
North Carolina Agribusiness
North Carolina Cotton Producers Association
North Carolina Farm Bureau
North Carolina Nursery and Landscape Association
North Carolina Pest Management Association
North Carolina Sod Producers Association
North Carolina Soybean Producers Association
North Central Weed Science Society
North Dakota Grain Growers Association
North Dakota Soybean Growers Association
North Florida Golf Course Superintendents Association
North Texas Golf Course Superintendents Association
Northeastern Golf Course Superintendents Association
Northeastern Weed Science Society
Northern California Golf Course Superintendents Association
Northern Virginia Nursery and Landscape Association
Northwest Horticultural Council
Northwest Mosquito and Vector Control Association

Northwest Ohio Golf Course Superintendents Association
Northwestern Illinois Golf Course Superintendents Association
Northwestern Pennsylvania Golf Course Superintendents Association
Ohio AgriBusiness Association
Ohio Farm Bureau
Ohio Lawn Care Association
Ohio Nursery and Landscape Association
Ohio Pest Management Association
Ohio Professional Applicators for Responsible Regulation
Ohio Soybean Association
Ohio Sports Turf Management Association
Ohio Turfgrass Foundation
Oklahoma Cotton Council
Oklahoma Farm Bureau
Oklahoma Golf Course Superintendents Association
Oklahoma Pest Management Association
Oklahoma Soybean Association
Old Dominion Golf Course Superintendents Association
Oregon Association of Nurseries
Oregon Golf Course Superintendents Association
Oregon Mosquito and Vector Control Association
Oregon Pest Control Association
Oregonians for Food and Shelter
Palm Beach Golf Course Superintendents Association
Peaks and Prairies Golf Course Superintendents Association
Pennsylvania Landscape and Nursery Association
Pennsylvania Pest Management Association
Pest Control Operators of California
Philadelphia Association of Golf Course Superintendents
Plains Cotton Growers, Inc.
Pocono Turfgrass Association
Potato Growers of Michigan, Inc.
Responsible Industry for a Sound Environment
Rhode Island Golf Course Superintendents Association
Ridge Golf Course Superintendents Association
Rio Grande Golf Course Superintendents Association
Rocky Mountain Farmers Union
Rocky Mountain Golf Course Superintendents Association
Rocky Mountain Sod Growers
Rolling Plains Cotton Growers
San Diego Golf Course Superintendents Association
San Joaquin Valley Quality Cotton Growers Association
Seven Rivers Golf Course Superintendents Association
Shady Canyon Golf Course Superintendents Association

Sierra Nevada Golf Course Superintendents Association
Society of American Florists
South Carolina Corn and Soybean Association
South Carolina Fertilizer and Agrichemical association
South Carolina Pest Control Association
South Carolina Sod Producers Association
South Dakota Agri-Business Association
South Florida Golf Course Superintendents Association
South Texas Cotton and Grain Association
Southern California Golf Course Superintendents Association
Southern Cotton Growers, Inc.
Southern Crop Production Association
Southern Kansas Cotton Growers Cooperative
Southern Nevada Golf Course Superintendents Association
Southern Nursery Association
Southern Rolling Plains Cotton Growers Association
Southern Weed Science Society
Sports Turf Managers Association
St. Lawrence Cotton Growers Association
Suncoast Golf Course Superintendents Association
Tennessee Corn Growers Association
Tennessee Farm Bureau Federation
Tennessee Farmers Cooperative
Tennessee Pest Control Association
Tennessee Soybean Association
Texas Agricultural Cooperative Council
Texas Citrus Mutual
Texas Corn Producers Association
Texas Cotton Producers, Inc.
Texas Farm Bureau
Texas Forestry Association
Texas Grain and Feed Association
Texas Nursery and Landscape Association
Texas Poultry Federation
Texas Rice Producers Legislative Study Group
Texas Soybean Association
Texas Wheat Producers Association
Treasure Coast Golf Course Superintendents Association
Tree Care Industry Association
Tri-State Golf Course Superintendents Association
Turfgrass Producers International
U.S. Apple Association
U.S. Canola Association
U.S. Durum Growers Association

U.S. Hop Industry Plant Protection Committee
U.S. Rice Producers Association
United Fresh Produce Association
United Producers, Formulators and Distributors Association
USA Rice
Utah Golf Course Superintendents Association
Utah Mosquito Abatement Association
Utah Pest Management Association
Vector Disease Control International
Vermont Golf Course Superintendents Association
Virginia Agribusiness Council
Virginia Farm Bureau
Virginia Golf Course Superintendents Association
Virginia Nursery and Landscape Association
Virginia Pest Management Association
Virginia Soybean Association
Virginia Turfgrass Council
Washington Association of Wheat Growers
Washington Friends of Farms and Forests
Washington Mint Growers Association
Washington State Pest Management Association
Washington State Potato Commission
Washington Winegrowers Association
Weed Science Society of America
West Texas Golf Course Superintendents Association
West Virginia Golf Course Superintendents Association
West Virginia Pest Management Association
Western Agricultural Processors Association
Western Plant Health Association
Western Society of Weed Science
Western Washington Golf Course Superintendents Association
Wisconsin Golf Course Superintendents Association
Wisconsin Landscape Contractors Association
Wisconsin Pest Control Association
Wisconsin Soybean Association
Wyoming Farm Bureau Federation