July 26, 2022

Anna Romanovsky,
Pesticide Re-Evaluation Division (7508P),
Office of Pesticide Programs,
U.S. Environmental Protection Agency,
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Submitted via regulations.gov

Re: Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses; EPA-HQ-OPP-2022-0490 – REQUEST FOR EXTENSION TO COMMENT PERIOD

Dear Ms. Romanovsky:

The undersigned organizations respectfully request a 90-day extension to the comment period on the U.S. Environmental Protection Agency’s (EPA) request for public comment on a November 2021 petition requesting that the Agency revoke all tolerances and cancel all associated registrations for certain organophosphate pesticides (OPs).

The undersigned organizations represent agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses and state departments of agriculture, who support sound science and the risk-based regulation of pesticides.

EPA is seeking comments on a November 2021 petition to revoke all tolerances and cancel all associated registrations for food uses for OPs, as well as a request for EPA to complete registration review on the OP class of chemicals by October 1, 2022. OPs are one of the few remaining classes of chemistry that is a broad-spectrum insecticide, which is an essential tool in integrated pest management programs. OPs protect crops from a wide range of insects, prolong the life of crops, and increase productivity. The continued availability of this group of pesticides is important to U.S. growers due to the safety and effectiveness of these proven pesticides.

This request to revoke tolerances for an entire class of chemicals is unprecedented. There are 15 active ingredients in this petition, some with several registered uses that impact a number of stakeholders, who will need sufficient time to thoroughly review and comment on this petition. The members of our organizations depend on the timely availability of safe and effective crop protection and pest control tools to support sustainable food and fiber production. In addition, public health depends on the continued availability of OPs to prevent against the spread of mosquito borne diseases and protect against the increasing threat of invasive species. The availability of a variety of pesticides is also a critical component in the management of pesticide resistance.

The length of time to comment of 30 days is not sufficient for our organizations to provide the substantive comments to EPA on this petition.
As a result, we respectfully request that EPA extend the public comment period by 90 days to allow us to gather and submit additional information in response to this comment development opportunity.

Thank you for considering this request. If you have any questions, please do not hesitate to contact us.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Mosquito Control Association
American Soybean Association
American Sugarbeet Growers Association
California Citrus Quality Council
California Specialty Crops Council
Council of Producers & Distributors of Agrotechnology
Golf Course Superintendents Association of America
International Fresh Produce Association
Minor Crop Farmer Alliance
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 Cotton Council
National Council of Farmer Cooperatives
National Onion Association
National Pest Management Association
National Potato Council
National Sorghum Producers
North Dakota Grain Growers Association
Oregonians for Food & Shelter
U.S. Beet Sugar Association
U.S. Canola Association
USA Rice
Washington State Potato Commission