

July 28, 2026

The Honorable Donald J. Trump
President of the United States
The White House
Washington, DC 20500

Dear Mr. President:

The undersigned organizations representing growers, agricultural retailers, input suppliers, crop protection manufacturers, and allied agricultural professionals across the country write to express our appreciation for your recognition of the essential role American farmers and ranchers play in maintaining a safe, abundant, and affordable food supply. Your Administration's commitment to working with agriculture, reducing regulatory burdens, and strengthening rural economies reflects a genuine understanding of what this industry needs to thrive.

We strongly support the Executive Order's direction for EPA to expedite the review and registration of new and alternative crop protection products. Delays in the pesticide registration process have long constrained farmers' access to innovative tools and newer chemistries, and the directive in Section 2(a) to complete registration actions — including all required risk assessments — as expeditiously as possible is a meaningful and welcome step. Expanding the range of tools available to farmers is a goal we share. At the same time, we want to be clear that new registrations must complement — not come at the expense of — the proven, established crop protection products that American farmers depend on today. Many of these products have decades of real-world use data, extensive safety records, and a well-established role in integrated pest management systems. They are not interchangeable with newer alternatives, and their continued availability is essential to farm productivity and profitability. We urge your Administration to ensure EPA implements the Section 2(a) directive with urgency, applying it equally to new product registrations and to existing products currently awaiting registration review.

At the same time, we write to raise serious concerns about how certain other provisions of the Executive Order may be implemented and the significant consequences that implementation could have for farmers' continued access to the established crop protection tools they depend on today. It is worth recalling that Congress has already acted, repeatedly and deliberately, to strengthen the rigor and scientific integrity of pesticide regulation. The Food Quality Protection Act of 1996 (FQPA) established a single, unified safety standard for pesticide residues on both raw and processed food, mandated periodic re-review of all registered pesticides on a 15-year cycle to ensure they continue to meet current scientific standards, and required EPA to apply an additional protective safety factor for infants and children when assessing dietary risk. The result is a pesticide registration and review process that is widely recognized as the gold standard in the world — the most rigorous, science-based, and comprehensive system for evaluating crop protection products anywhere. Products that have earned and maintained registration under this framework have met an extraordinarily high bar. New regulatory processes developed outside this framework do not build on that foundation; they undermine it, and in doing so they undermine the credibility of the approvals already granted under it.

Expediting New Pesticide Registrations

Section 2(a) directs EPA to prioritize registration actions for substances that can serve as alternatives to older active ingredients, with all registration actions completed as expeditiously as possible. We fully support this directive and encourage EPA to implement it with the following in mind. First, registration timelines should be clearly defined and enforced, with EPA establishing public benchmarks for completion of pending reviews. Second, the expedited timeline must extend to all pending registration actions — not only new alternatives — so that established products with decades of safety data and real-world efficacy awaiting registration review are not deprioritized or disadvantaged relative to newer chemistries. The phrase “older active ingredients” should not be read to imply that existing, proven products are candidates for phase-out; many of these products have been reviewed and re-reviewed under the rigorous standards Congress established through FQPA, have satisfied the 15-year periodic review cycle, and remain among the most effective, affordable, and well-understood tools available to farmers. Third, resources committed to accelerating new registrations should not come at the expense of rigorous but efficient review of the full registration docket. Done right, this provision can meaningfully expand the range of tools available to American farmers and the agricultural retailers who serve them while preserving the established products they rely on today.

Review of Pre-Harvest Uses and Labeling

Section 2(b) directs EPA to review all registered pre-harvest desiccation uses and ensure alignment with applicable safety and environmental standards, including accurate labeling — but critically, it does so “consistent with existing statute and regulations.” That limiting clause matters: EPA’s authority under Section 2(b) is bounded by FIFRA, and the EO itself does not authorize EPA to act outside that statutory framework. Pre-harvest desiccation is a well-established and agronomically important practice used in specific crops and growing conditions where uniform crop maturity and moisture reduction before harvest are operationally necessary — enabling timely harvest, reducing post-harvest losses, and meeting the quality and consistency requirements of domestic and export markets. It is not a universal practice across all crops or all pesticide products, and it is important that any EPA review be scoped accurately to the registered uses actually at issue. It is also worth noting that the products used in these applications fall into distinct regulatory and agronomic categories — including true contact desiccants and pre-harvest systemic herbicides registered for weed control — and those distinctions matter for how any review should be scoped and conducted. All registered uses in this category have been reviewed and approved by EPA under FIFRA’s existing standards, and the active ingredients involved are subject to EPA’s registration review framework, which already provides EPA full authority to require additional data and reassess registered uses at any time.

Our threshold concern is whether a separate, use-targeted review of desiccant products is necessary or appropriate given that these uses are already subject to EPA’s FIFRA-based registration review framework. That framework already provides EPA full authority to evaluate safety, require additional data, and revise labels, and several of the key active ingredients involved are already mid-review. Initiating a parallel, product-specific review focused solely on pre-harvest desiccation uses would be duplicative of those existing processes and an inefficient use of agency resources that are already strained by a large backlog of pending registration decisions. To the extent EPA conducts any review under Section 2(b), we urge your Administration to ensure it is carried out through FIFRA’s existing framework — consistent with

the EO's own limiting language — and not through a new, standalone process that creates additional regulatory uncertainty for farmers and the supply chain. Any such review should be grounded in current, real-world use and residue data; should meaningfully engage growers, agricultural retailers, and pesticide applicators as stakeholders before any conclusions are reached; and should apply FIFRA's established standard, which expressly requires EPA to weigh a product's risks against its agronomic, economic, and social benefits. Done right, this can affirm the safety and continued availability of these tools through the processes Congress designed for exactly that purpose.

Cumulative Exposure Framework and Crop Protection Research

Section 2(c) directs EPA, USDA, and HHS to develop a cumulative exposure framework across chemical classes regulated in the food supply. Section 2(d) directs ARPA-H to prioritize research aimed at reducing reliance on conventional chemical crop protection tools. Taken together, these provisions could set in motion a regulatory and research trajectory that — regardless of intent — creates pressure to restrict or phase out pesticide products that American farmers currently rely on and that have been reviewed and approved under rigorous federal standards.

EPA's current approach to cumulative risk assessment — grouping chemicals by common mechanism of toxicity — reflects decades of scientific and regulatory experience. Expanding that framework to unrelated chemical classes, absent strong scientific consensus, would introduce significant uncertainty into the registration review process and could disrupt farmers' ability to plan their operations. We strongly urge that any revised approach to cumulative exposure assessment be incorporated into EPA's existing registration review process — not layered on as a new, freestanding framework that operates outside or alongside FIFRA's established standards. Creating a separate cumulative exposure process would risk producing regulatory conclusions that are disconnected from the statutory framework Congress designed for this purpose, and would open the door to ongoing disruption of farmers' access to registered tools every time a new methodology is proposed. If scientific evidence warrants refining how cumulative risk is assessed, that refinement should occur within existing processes, through a transparent, peer-reviewed process with robust public comment, Science Advisory Panel review, and clear criteria — and existing registrations should remain in effect unless clear evidence of risk under current FIFRA standards is established.

We also respectfully caution that directing federal research resources toward replacing conventional crop protection tools, before alternatives of comparable efficacy and affordability exist, risks leaving farmers without adequate options. Innovation in crop protection is something the agricultural community wholeheartedly supports — but it must complement access to existing tools, not be used to justify restricting them.

Path Forward

American farmers cannot afford regulatory uncertainty about the tools they need to grow crops efficiently and profitably. We respectfully request the opportunity to meet with your Administration and the relevant agency heads to discuss implementation of these provisions before agency action is taken. The organizations signing this letter represent millions of acres of American farmland and the agricultural retailers and agribusinesses that serve them. We are committed to working constructively with your Administration, and we believe that with the

right implementation approach, the Executive Order can deliver real benefits for American agriculture while preserving the access to essential crop protection tools that farmers depend on today.

Thank you for your continued commitment to American agriculture.

Sincerely,

Agribusiness Association of Iowa
AgriBusiness Association of Kentucky
Agribusiness Council of Indiana
Agricultural Council of Arkansas
Agricultural Retailers Association
American Mushroom Institute
Arizona Crop Protection Association
Arkansas Rice Growers Association
Association of North Dakota Agribusiness
California Specialty Crops Council
Council of Producers & Distributors of Agrotechnology (CPDA)
CropLife America
Far West Agribusiness Association
Florida Fertilizer & Agrichemical Association
Georgia Agribusiness Council
Kansas Agribusiness Retailers Association
Lone Star Agribusiness Association
Michigan Agri-Business Association
Minnesota Crop Production Retailers
Mississippi Agricultural Industry Council
Missouri Agribusiness Association
Montana Agricultural Business Association
National Agricultural Aviation Association
National Alliance of Independent Crop Consultants
National Onion Association
Nebraska Agri-Business Association
North Carolina Agribusiness Council
North Central Weed Science Society
Northeastern Society of Weed Science
Ohio AgriBusiness Association
Oklahoma Agribusiness Retailers Association
Oregonians for Food and Shelter
South Dakota Agri-Business Association
Southern Crop Production Association
Southern Weed Science Society
Texas Ag Industries Association
Virginia Agribusiness Council
Weed Science Society of America

Western Society of Weed Science
Wyoming Ag Business Association

Cc: The Honorable Lee Zeldin, Administrator, U.S. Environmental Protection Agency
The Honorable Brooke L. Rollins, Secretary, U.S. Department of Agriculture
The Honorable Robert F. Kennedy, Jr., Secretary, U.S. Department of Health and Human
Services