

September 15, 2020

Dear Senator:

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