



**AGRICULTURAL
RETAILERS
ASSOCIATION**

4201 Wilson Blvd. • Suite 700 • Arlington, VA 22203

T 202.457.0825 • F 202.463.0474 • www.aradc.org

May 31, 2022

U.S. Environmental Protection Agency
Office of Pesticide Programs – Registration Division
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

**RE: PESTICIDE PRODUCT REGISTRATION: CANCELLATION ORDER – CHLORPYRIFOS;
DOCKET # EPA-HQ-OPP-2022-0223**

On behalf of the Agricultural Retailers Association (ARA), I am writing to express serious concerns with pesticide registration cancellation notices for chlorpyrifos. ARA believes chlorpyrifos is a critical tool needed by agricultural retailer and their farmer customers to address serious pest infestations.

ARA is a 501(c)(6) non-profit trade association that represents the interests of agricultural retailers and distributors across the United States on legislative and regulatory issues. Ag retailers supply farmers and ranchers with products and services such as seed, nutrients, crop protection products, feed, equipment, and technology. Retailers also provide consultative services such as crop scouting, soil testing, field mapping, custom planting and application and development of nutrient management and conservation plans. Agricultural retailers range in size from small, family-held businesses to large companies and farmer-owned cooperatives with multiple outlet stores. Large and small retail facilities are scattered throughout all fifty states and provide critical goods and services, as well as jobs and economic opportunities in rural and suburban communities.

As ARA and many other agricultural organizations have commented during the ongoing registration review for chlorpyrifos (EPA-HQ-OPP-2008-0850), this chemistry holds a unique and significant value for many agricultural producers. Chlorpyrifos has more than 50 registered agricultural uses on numerous crops, many of which are high benefit uses to protect against economically significant pests. ARA objected to the tolerance revocation of all uses, as EPA's own risk assessments show some uses meet the legal standard under Federal Food, Drug, and Cosmetics Act (FFDCA). Additionally, the cancellation of this important product will leave thousands of growers across the country defenseless to devastating pests, which is why ARA requests that EPA withhold the registration cancellations of chlorpyrifos until the pending lawsuit filed in federal court challenging the EPA's decision to ban all use of chlorpyrifos on food crops is fully litigated.

ARA urges EPA re-consider these pesticide registration cancellations and postpone any final decision until the agency holds additional discussions with impacted stakeholders and any pending federal litigation is fully settled in the courts.

Thank you for your review and consideration of our comments!

Sincerely,

Richard D. Gupton
Senior Vice President, Public Policy & Counsel