

## Coalition of OP Registrants

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**DRAFT**

July 29, 2022

Via Docket

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

Re: Docket No. EPA-HQ-OPP-2022-0490; Response to United Farm  
Workers Petition -- Request for Extension of Comment Period

Dear Ms. Romanovsky:

The Coalition of Organophosphate (OP) Registrants (Coalition) submits this letter to request an extension of 120 days, to **December 9, 2022**, to comment on the petition filed by the United Farm Workers (UFW) and others asking the U.S. Environmental Protection Agency (EPA) to revoke all tolerances and cancel all registrations for the following 15 organophosphate (OP) pesticides (Petition)<sup>1</sup>:

- Acephate (EPA-HQ-OPP-2008-0915);
- Bensulide (EPA-HQ-OPP-2008-0022);
- Chlorethoxyfos (EPA-HQ-OPP-2008-0843);
- Chlorpyrifos-methyl (EPA-HQ-OPP-2010-0119);
- Diazinon (EPA-HQ-OPP-2008-0351);

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<sup>1</sup> 87 Fed. Reg. 41310 (July 12, 2022).

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- Dichlorvos (EPA-HQ-OPP-2009-0209);
- Dicrotophos (EPA-HQ-OPP-2008-0440);
- Dimethoate (EPA-HQ-OPP-2009-0059);
- Ethoprop (EPA-HQ-OPP-2008-0560);
- Malathion (EPA-HQ-OPP-2009-0317);
- Naled (EPA-HQ-OPP-2009-0053);
- Phorate (EPA-HQ-OPP-2007-0674);
- Phosmet (EPA-HQ-OPP-2009-0316);
- Terbufos (EPA-HQ-OPP-2008-0119); and
- Tribufos (EPA-HQ-OPP-2008-0883).

OPs are one of the few remaining classes of chemistry that are broad-spectrum insecticides. OPs protect crops from a wide range of insects, prolong the life of crops, and increase productivity for many thousands of growers, including those growing a wide variety of minor-use crops. The products using the active ingredients at issue are essential to the timely availability of safe and effective crop protection; they are essential pest control tools to support sustainable food and fiber production, they promote international commerce through well-established maximum residue levels (MRLs), and they combat mosquito- and other insect-borne public health issues that impact all Americans.

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The availability of these pesticide products is also a critical component in the management of pesticide resistance. For example, because there are only two classes of chemistry available for adult mosquito control -- the pyrethroids and OPs -- canceling the OPs would cause a collapse of public health mosquito control, as the only means to combat resistance to pyrethroids will have been eliminated. For these reasons, the continued availability of this group of pesticides is crucial.

The Petition's request to revoke tolerances for an entire class of chemicals, if granted, would be unprecedented. The Petition requests the cancellation of tolerances for 15 active ingredients, a number of which with an extensive variety of registered uses that impact a number of stakeholders. At least 120 days' more time is necessary to allow the Coalition and many other impacted stakeholders adequate opportunity to review and respond to the Petition, which, in addition to making broad claims challenging the nature and legal framework by which EPA reregisters pesticides and reassesses tolerances, makes a multitude of specific claims about the purported risks identified in human health risk assessment documents. Moreover, additional time is essential to review the multitude of claims that contain many references to other documents and data points (*e.g.*, an exhibit list including 45 references), each of which must be reviewed.

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The Coalition is aware of EPA’s October 1, 2022, registration review deadline, but also recognizes, along with Petitioners, that EPA “will not be able to fully meet that deadline.” The Coalition believes that this extension request, necessary to provide meaningful comments to the Petition, will not impact the practical timeline for the registration review process. In fact, seven months elapsed from the date EPA received the Petition until it issued its *Federal Register* notice seeking comments on the Petition. Regardless, it is essential for the Coalition and many other impacted stakeholders to have an adequate comment opportunity, and this is not possible without an extension of at least 120 days.

Thank you for your consideration of this request. Please do not hesitate to contact me if you would like to discuss this request or have any questions.

Sincerely,

Cindy Smith  
Chair, Coalition of OP Registrants