



PPC

PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

January 26, 2024

The Honorable Sam Graves
Chair
Transportation & Infrastructure Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
Transportation & Infrastructure Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable David Rouzer
Water Resources & Environment Subcommittee
Transportation & Infrastructure Committee
U.S. House of Representatives
Washington, DC 20515

The Honorable Grace Napolitano
Water Resources & Environment Subcommittee
Transportation & Infrastructure Committee
U.S. House of Representatives
Washington, DC 20515

Dear Chairmen Graves and Rouzer and Ranking Members Larsen and Napolitano:

On behalf of the Pesticide Policy Coalition (PPC), I would like to thank you for taking up the “Reducing Regulatory Burdens Act of 2023” (HR 5089). This legislation will eliminate costly, duplicative, and unnecessary Clean Water Act National Pollutant Discharge Elimination System (NPDES) permit requirements which impact some of our members.

The PPC represents agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses/entities, which are dependent on the availability of pesticides. Our coalition supports the development and implementation of public policies and laws that utilize the best available science and technology to ensure protection of human health and the environment.

PPC members include national and regional trade associations; commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators, and distributors; pest and vector-control applicators and operators; research organizations; state departments of agriculture; equipment manufacturers, and other interested stakeholders. The PPC serves as the unifying voice for the review, discussion, development and advocacy on pest management regulation and policy that is based on the best available science.

NPDES pesticide general permits (PGPs) do not add any additional environmental benefits over those included on the pesticide product label, but they add significant costs and paperwork requirements which make it more expensive to protect people from mosquitoes that can vector the Zika Virus, West Nile Virus, Dengue Fever, and other viruses. The permits also make it more expensive to control invasive aquatic plants that overtake our waterways and impede endangered species’ habitat. Finally, NPDES permits add additional costs to vegetation management, an essential tool in controlling the outbreak and spread of forest fires.

Pesticides are regulated under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and the Food Quality Protection Act (FQPA). The U.S. Environmental Protection Agency (EPA) pesticide registration process requires registrants to conduct numerous scientific studies and the EPA to conduct an extensive risk assessment to ensure the products meet the FIFRA registration standard of no unreasonable adverse effects to the environment. This registration process culminates in the development of a legally binding product label that includes specific directions for use, along with precautionary statements, storage and disposal directions and other information to instruct on the legal and safe use of the product. Pesticides that are approved for use in, over or near water require additional studies to ensure that the products are safe for aquatic use. State registration is also required before a product can be used in the state.

The elimination of these permits will decrease regulatory burdens without a negative environmental impact. HR 5089 will increase response time for treatments to protect public health, prevent the rapid spread of invasive species and more readily address other pest pressures. It will save resources for states, municipalities, and communities so they can focus on actual environmental issues. We support this legislation and look forward to working with you and your colleagues to advance this bill.

Thank you very much for your attention to this important legislation. If the PPC can be of assistance in any way, or if you have questions, please contact me at shensley@cotton.org or (703) 475-7716.

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley
Chair, Pesticide Policy Coalition