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June 10, 2025

Charles Smith, Director
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania, Avenue, N.W.
Washington, D.C. 20460-0001

RE: Registration for the New Active Ingredient of Isocycloseram; Docket # EPA-HQ-OPP-2021-0641

Dear Director Smith,

On behalf of the Agricultural Retailers Association (ARA), I am pleased to submit this letter supporting the registration of Isocycloseram, a new active ingredient developed as a broad-spectrum insecticide suitable for both agricultural and non-agricultural use.

ARA is a national not-for-profit trade association representing agricultural retailers and distributors across the United States. Our members, ranging from small family-owned businesses and farmer cooperatives to large enterprises with multiple locations, provide critical goods and services to farmers and ranchers. These include fertilizers, crop protection chemicals, seeds, crop scouting, soil testing, pesticide and fertilizer application, and nutrient management planning.

Isocycloseram introduces a breakthrough in pest management by offering growers a non-systemic solution to combat a wide range of economically significant pests across various crops. This innovative product supports Integrated Pest Management (IPM) strategies and strengthens resistance management efforts. Notably, Isocycloseram has demonstrated no known resistance or cross-resistance, positioning it as a valuable resistance breaker against pests such as the diamondback moth and Colorado potato beetle—two species that have developed resistance to existing insecticides. The Environmental Protection Agency (EPA), in its Memorandum Supporting Proposed Decision to Approve Registration for the New Active Ingredient of Isocycloseram, has acknowledged these benefits. The EPA highlights that Isocycloseram serves as an essential tool for pest and resistance management, offering growers an alternative to pesticides that may pose greater risks to human health or the environment. Importantly, the EPA has determined that the benefits of Isocycloseram outweigh potential risks to non-listed species. Furthermore, Isocycloseram marks a significant milestone as the first insecticide to complete the new Endangered Species Act (ESA) assessment, underscoring its potential to deliver sustainable and innovative pest control options while continuing to support IPM practices.

We appreciate the opportunity to provide these comments and emphasize the critical role Isocycloseram can play in advancing agricultural pest management solutions.

Sincerely,

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