

April 6, 2026

Natalie Bray
Senior Regulatory Advisor, Pesticide Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-0001

RE: Comments on EPA’s Proposed “Process to Become an EPA Qualified Conservation Program (QCP) and Qualified External Party (QEP); Docket ID: EPA-HQ-OPP-2025-1906

Dear Ms. Bray:

The Agricultural Retailers Association (ARA) appreciates the opportunity to comment on EPA’s proposed process to qualify conservation programs and external technical experts to support implementation of pesticide runoff and erosion mitigation requirements under the Endangered Species Act (ESA).

ARA represents agricultural retailers who serve as trusted advisors to farmers, delivering agronomic, nutrient management, and crop protection guidance that improves productivity while protecting soil, water, and other natural resources. Stewardship and sustainability are long-standing priorities for ARA and its members, who support science-based, outcome-driven, and voluntary approaches to environmental protection.

ARA supports EPA’s objective of reducing pesticide runoff and erosion and agrees that conservation outcomes are most effectively achieved when growers are given clear credit for stewardship practices already in place and access to technically qualified advisors who can translate policy requirements into practical field-level implementation.

USDA-NRCS Conservation Programs as a Foundation for Outcome-Based Stewardship

ARA strongly supports EPA’s proposal to credit qualifying conservation programs and urges EPA to clearly recognize U.S. Department of Agriculture’s (USDA) Natural Resources Conservation Service (NRCS) conservation programs as foundational Qualified Conservation Programs (QCPs).

ARA policy consistently emphasizes that sustainability initiatives should be outcome-based rather than prescriptive, rewarding measurable environmental benefits rather than imposing one-size-fits-all mandates. USDA-NRCS conservation programs reflect these principles by relying on peer-reviewed, science-based conservation practice standards; adapting conservation planning to local soil, slope, climate, and hydrologic conditions; documenting implementation and continuous improvement; and encouraging voluntary participation through technical and financial assistance.

Many NRCS-supported practices directly address runoff and erosion concerns underlying EPA's Mitigation Point System. Recognizing these programs as qualifying pathways allows EPA to build upon existing stewardship investments rather than require duplicative conservation planning.

Certified Crop Advisors, SPARC, and Qualified External Party

ARA strongly supports EPA's proposal to recognize qualified technical experts who can assess field-level conditions and document mitigation points achieved on agricultural fields. In finalizing this framework, EPA should explicitly recognize Certified Crop Advisors (CCAs) as eligible EPA-Qualified External Parties (QEPs).

CCAs play a central role in advancing sustainable agricultural outcomes. Many CCAs are also USDA-NRCS-certified Technical Service Providers (TSPs), with experience designing and implementing conservation practices that reduce runoff and erosion.

In addition, CCAs and agricultural retailers demonstrate leadership through participation in the Sustainability Professional Advancement Roadmap (SPARC). Through SPARC, CCAs already evaluate conservation practices using outcome-focused metrics, integrate sustainability objectives into agronomic decision-making, and document environmental performance.

Avoiding Duplicative Processes; Deeming Existing USDA Qualifications Sufficient

ARA urges EPA to finalize the QCP/QEP framework in a manner that is administrable, transparent, and non-duplicative. EPA should clarify that QEP qualification is additive and voluntary and not a substitute for existing USDA-recognized conservation planning pathways. EPA should expressly deem USDA-NRCS-certified Technical Service Providers (TSPs), including CCAs who are TSPs, as meeting QEP competency requirements for erosion and sediment mitigation. Creating overlapping certifications would impose redundant burdens without producing additional environmental benefit.

EPA should also confirm that growers will continue to receive mitigation credit for working with CCAs and existing conservation plans, and that no de facto credentialing prerequisite will be created through point incentives.

Supporting Voluntary, Incentive-Based Conservation

ARA's stewardship priorities emphasize collaboration, education, and voluntary adoption of conservation practices. EPA should ensure the final framework avoids duplicative field assessments, preserves grower flexibility, and reduces compliance complexity.

Regulatory Certainty and ESA Alignment

The final PR Notice should clearly state that QCP/QEP qualification does not create new substantive regulatory obligations, expand liability under FIFRA, or displace USDA's conservation planning role.

Conclusion

ARA supports EPA's efforts to integrate conservation programs and qualified technical expertise into the Mitigation Point System and appreciates the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink that reads "Richard D. Gupton". The signature is written in a cursive style with a large, prominent "R" at the beginning.

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