



May 29, 2026

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Urgent Request for Timely Registration of Pending Crop Protection Products

Dear Administrator Zeldin:

The Agricultural Retailers Association (ARA), which represents the nation's agricultural retailers and distributors, appreciates your strong leadership at EPA and the agency's recent actions to support American agriculture. We commend your approval of the over-the-top (OTT) dicamba registration for dicamba-tolerant cotton and soybean crops, restoring a critical weed management tool to farmers who depend on it to combat resistant species such as Palmer amaranth and waterhemp. We also applaud EPA's recent approval of CarriCea T1, a breakthrough citrus rootstock that gives Florida and other citrus growers a powerful new tool in the fight against citrus greening disease — a bacterial infection that has devastated domestic citrus production for two decades. These actions demonstrate that EPA can and does act decisively on the science. We write today to respectfully request the same timely action on the pending pesticide registrations described in this letter, each of which has similarly completed EPA's full scientific review and is long overdue for final approval.

The Science Is Done — Action Is Justified Now

Each of the pending registrations listed in this letter has:

- Completed EPA's full scientific and risk assessment review process
- Been found safe by EPA scientists for human health and the environment when used as labeled
- Represented 10–13 years of development and hundreds of millions of dollars in R&D investment by U.S.-based companies
- Exceeded the statutory review deadlines under FIFRA — many by more than two years

Continued delay is not a scientific decision — it is a policy choice with serious economic consequences. The law requires EPA to act. ARA respectfully requests that EPA honor both the science and the statute.

Pending Registrations: Scientific Review Complete, Final Approval Overdue

The following products are awaiting EPA final registration action. Each has cleared all required technical and scientific reviews:

Action	Type	Target Pests / Diseases	Crops	Submitted	EPA Docket
New AI	Herbicide	Broad-spectrum weeds incl. resistant Palmer amaranth, waterhemp	Corn, Soybean, Wheat, Canola, Bare Ground	1/24/2022	EPA-HQ-OPP-2022-0354
New AI	Herbicide	Broadleaf weeds incl. Amaranthus species	Corn, Soybean, Legume Vegetables, Peanut, Small Grains, Sorghum, Bearing Fruit & Nut Trees	4/28/2022	EPA-HQ-OPP-2022-0649
New Use	Herbicide	Broadleaf weeds (Amaranthus spp.) & grass weeds (barnyard grass, crabgrass, foxtail)	Soybean, Cotton	12/12/2019	EPA-HQ-OPP-2019-0398
New AI	Herbicide	Broadleaf weeds	Corn, Soybean	3/3/2021	EPA-HQ-OPP-2021-0435
New Use	Herbicide	Broadleaf weeds	Turf	4/20/2022	EPA-HQ-OPP-2022-0163
New AI	Fungicide	Hull Rot, Shot Hole, Powdery Mildew, Botrytis cinerea, Stem Canker, Shoot Blight	Grapes, Tree Nuts, Pome Fruit	11/22/2019	EPA-HQ-OPP-2020-0226

These registrations represent critical tools for managing resistant weed species, fungal diseases, and emerging pest pressures across major U.S. commodity and specialty crops.

Why These Products Are Needed Now

- Resistant weeds are expanding rapidly. Palmer amaranth and waterhemp — the most damaging resistant weed species in U.S. agriculture — have spread to new geographies and are overwhelming existing herbicide programs in corn, soybean, and cotton. New modes of action are urgently needed to slow resistance development and protect yields.
- Fungal disease pressure is intensifying in specialty crops. Growers of grapes, tree nuts, and pome fruit face rising incidence of powdery mildew, botrytis, shoot blight, and hull rot. Fewer registered fungicide options create dangerous gaps in integrated disease management programs.
- Foreign competitors already have access to these products. While U.S. farmers wait, producers in other countries are using the same or equivalent technologies — placing American agriculture at a direct cost and productivity disadvantage in global markets.
- New modes of action protect the longevity of existing tools. Rotating chemistries is essential to resistance management. Delayed access to new active ingredients accelerates the development of resistance to currently registered products, compounding the long-term problem.
- MAHA goals are undermined by delay. The Administration’s Make America Healthy Again strategy calls for a robust, secure domestic food supply. Blocking proven crop protection tools raises production costs, reduces yields, and increases food prices — outcomes directly contrary to MAHA’s objectives.

The 2027 Growing Season Is the Last Viable Window

Even with immediate registration approval, the commercial pathway to farmer access requires time:

- EPA label finalization and publication
- State-level registrations across multiple crop uses and jurisdictions
- Manufacturing scale-up, supply chain distribution, and retail placement

These steps are sequential and time-intensive. Without final EPA action in the near term, these products will not be available at commercial scale for the 2027 growing season. Another missed planting window translates to measurable yield losses, higher pest damage costs, and continued competitive disadvantage for U.S. growers.

Broader Economic and Food Security Consequences

Delayed registrations have cascading effects across the agricultural economy:

- Reduced crop yields due to inadequate pest and disease control options
- Higher production costs as growers rely on less effective, more expensive, or more frequently applied alternatives

- Increased food prices and supply volatility affecting domestic consumers and U.S. export competitiveness
- Undermined re-shoring investment: no company will commit capital to U.S. manufacturing in a regulatory environment defined by arbitrary, prolonged delays
- Weakened U.S. agriculture's position as a \$176 billion export engine

ARA's Request

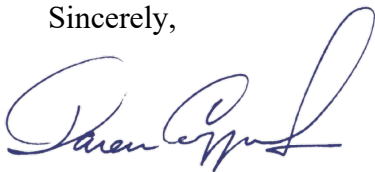
ARA respectfully urges EPA to take the following actions without further delay:

- Immediately approve all registrations listed in this letter for which scientific review is complete;
- Adhere to FIFRA statutory timelines and restore predictability and credibility to the federal registration process;
- Base decisions solely on EPA's completed scientific assessments, not political considerations; and
- Deliver regulatory certainty so these products can be manufactured, distributed, and available to farmers for the 2027 growing season.

Agricultural retailers are the final link between crop protection innovations and the farmers who need them. ARA stands ready to work with EPA to ensure American farmers have access to the tools that protect their crops, their livelihoods, and the food security of the nation.

We appreciate your consideration and urge prompt action. I would be happy to visit further if we may be of assistance in finalizing these registrations.

Sincerely,



W. Daren Coppock
President & CEO
Agricultural Retailers Association