

September 14, 2020

The Honorable _____
U.S. House of Representatives/United States Senate
Washington, DC 20

Dear MC/USS:

We write to share our support of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and our opposition to the Protect America's Children from Toxic Pesticides Act of 2020 (H.R. 7940, S. 4406) which undermines 70 years of regulatory advancement based on best available science. We represent a wide range of groups who rely on the availability of safe and effective pesticides in diverse settings to produce America's food, fiber, and biofuel and to protect our public health and infrastructure.

FIFRA has been amended by Congress on several occasions to strengthen the regulatory standard for safety – most recently by the Food Quality Protection Act that added specific protections for infants and children among other things. FIFRA provides for federal regulation of pesticide distribution, sale, and use and establishes stringent safety standards and oversight. All pesticides distributed or sold in the United States must be registered by the U.S. Environmental Protection Agency (EPA), and then reregistered every fifteen years. EPA rigorously reviews scientific and health data for all pesticide products before they are made available for sale and use, and the data must show products work as intended on their target pest and can be used safely. Label restrictions and instructions are designed to ensure a product is used effectively and safely in a manner that mitigates any identified risks. FIFRA already requires EPA to consider economic, social, and environmental benefits *and* risks, and FQPA requires special considerations for risks to infants and children, when determining if a product can be registered. While reregistration is required to occur at least every fifteen years, it can and often does occur more frequently. EPA can initiate a review if scientific data becomes available that questions the safety of a product. For example, some of the organophosphate products specifically mentioned in H.R. 7940 and S. 4406 have undergone multiple EPA risk assessments since 1996.

Instead, the legislation as introduced would gut decades of federal regulation and scientific progress, undermining the work of EPA's career scientists in the evaluation of pesticide safety and oversight of pesticide registration and use. The bills would jeopardize the continued availability and innovation of pesticide products by imposing an unscientific and unbalanced process that could unnecessarily remove pest control options from those who need them to safely grow crops, protect homes and infrastructure, and control pathogens and disease vectors.

Pesticide manufacturers, pesticide users, and the public all have an interest in ensuring that the pesticide regulatory process imposes stringent regulatory controls on pesticide use based on the principles of sound science, transparency, and broad stakeholder engagement. We remain committed to protecting human health and the environment while maintaining America's important food, fiber, and biofuel production and protecting its public health and infrastructure.

If we can provide additional information or answer questions useful towards meeting these goals, please know our member organizations would be happy to provide more detail.

Sincerely,