



CALIFORNIA FARM BUREAU FEDERATION

EXECUTIVE OFFICES

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July 7, 2017

Yu-Ting Guilaran, Director
Pesticide Re-Evaluation Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Registration Review; Draft Human Health and Ecological Risk Assessments

Docket ID No. EPA-HQ-OPP-2015-0393, and the following:

EPA-HQ-OPP-2010-0384	EPA-HQ-OPP-2009-0301
EPA-HQ-OPP-2010-0684	EPA-HQ-OPP-2007-0804
EPA-HQ-OPP-2012-0167	EPA-HQ-OPP-2010-0422
EPA-HQ-OPP-2011-0907	EPA-HQ-OPP-2016-0031
EPA-HQ-OPP-2012-0501	EPA-HQ-OPP-2010-0479
EPA-HQ-OPP-2010-0915	EPA-HQ-OPP-2011-0692
EPA-HQ-OPP-2011-0885	EPA-HQ-OPP-2010-0480
EPA-HQ-OPP-2009-0842	EPA-HQ-OPP-2015-0752
EPA-HQ-OPP-2011-0539	EPA-HQ-OPP-2011-0039
EPA-HQ-OPP-2009-0637	EPA-HQ-OPP-2011-1009

Dear Ms. Guilaran:

The California Farm Bureau Federation (CFBF) would like to submit comments on the above referenced docket, by which the U.S. Environmental Protection Agency seeks public comment on the registration review draft risk assessments of several pyrethroid insecticides, including bifenthrin (Docket EPA-HQ-OPP-2010-0384). Because EPA has opened several dockets relating to these various pesticides, we respectfully request that these comments be considered in conjunction with the several dockets referenced above relating to this class of pesticides.

As California's largest agriculture organization, CFBF represents over 48,000 farmers, ranchers and associated members throughout the state who are engaged in the world's most abundant and diverse production of food and fiber. On their behalf, we strongly disagree with and oppose the agency's proposed draft risk assessment results.

Without question, pyrethroid insecticides provide the agricultural sector significant benefits in managing crops and provide us the ability to produce our food in a safe, efficient, and affordable manner. Pyrethroids have a wide variety of uses with minimal associated risks and have a

significant economic impact to California's agriculture industry. There are very few alternatives to pyrethroids that can provide this high of a benefit to risk ratio. Short re-entry intervals and pre-harvest intervals, coupled with broad-spectrum control, make pyrethroids California growers' best choice when controlling pest infestations late in the crop season.

Pyrethroids are a crucial tool for farmers and ranchers to have in their Integrated Pest Management (IPM) plans. With limited alternatives, currently available pyrethroids provide farmers with an effective tool to protect crops from sudden infestations of destructive and invasive insect pests, with minimal exposure risk to employees applying the crop protection material. Pyrethroids are relatively non-toxic to humans and have minimal impact on the surrounding environment. In fact, pyrethroids are used to kill Black Widow Spiders on grapes, protecting growers and their employees as they care for the crop by hand.

Without pyrethroids, many California crops would suffer significant yield and financial losses from unexpected and overwhelming pest infestations. California produces over 400 different commodities throughout the state, many of which are specialty crops. The highest valued plant commodities of California's \$47 billion agriculture industry are almonds and other tree nuts, grapes, lettuce, berries and tomatoes.¹ According to a recently completed economic analysis, pyrethroid use on those five commodities alone had a \$1.6 billion economic benefit in 2015.²

Another important factor of pyrethroid insecticides is that they are widely used and accepted around the world, making them crucial for moving product into channels of trade. In 2015 California exported almost \$21 billion of agricultural products. Many importing countries such as Japan and the EU (two of our most important trading partners) have severely restricted pesticide tolerances; pyrethroids are some of the few materials that have established residue limits. California agriculture will lose its competitive advantage in the global marketplace if our farmers and ranchers cannot use pyrethroid insecticides. Additionally, pyrethroids are used to control pests on crops for which importing countries have a zero-tolerance. For example, California citrus growers apply bifenthrin as a barrier treatment to avoid infestation with an international quarantine pest, the Fuller Rose Beetle.

The preliminary draft risk assessment conducted by the EPA is just that – preliminary. CFBF policy states “we support reducing pesticide risks and dangers where they actually exist.” Therefore, we cannot support using a draft risk assessment to determine the use of a class of insecticides that has so much value. The initial draft risk assessment does not take into account the considerations listed above, uses overly conservative guidelines, incorrect application methods and outdated science. For example, the draft risk assessment used pecans grown in

¹ California Department of Food and Agriculture. 2016. *California Agricultural Statistics Review 2015-2016*. p. 1-4

² ERA Economics. June 12, 2017. *Economic Benefits of Pyrethroid Insecticides for Select California Crops*. p. 1

Georgia to make an estimate for all tree crops. This certainly is problematic for a variety of reasons but mainly because of the difference between rainy Georgia versus California's largely dry climate, as well as the difference in the size of almond and pistachio versus pecan trees. California has 100% use data available; EPA should analyze that data to refine how pyrethroids are actually applied to crops in this state, instead of making assumptions about how they might be used.

The most astounding piece of information left out of the assessment is the fact that pyrethroids are hydrophobic, meaning the molecules avoid water and instead cling to organic compounds. When bound in this way, the molecules are not bioavailable and therefore not toxic. Pyrethroids are quickly degraded by plants and biofilms, and if ingested by an organism, they are quickly excreted as non-toxic compounds. These critical facts are reason enough to counter the assessment's claim that pyrethroids pose a risk to aquatic organisms.

We appreciate the agency's consideration of these comments and look forward to reviewing a revised assessment that incorporates all pertinent studies, proper handling methods and most importantly, the significance of this class of insecticides to agricultural producers and consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Wenger", with a stylized flourish at the end.

Paul Wenger, President
California Farm Bureau Federation