



GEORGIA AGRICULTURAL COMMODITY COMMISSION FOR PEANUTS

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August 30, 2022

Anna Romanovsky
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

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DON KOEHLER
Executive Director

Re: Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses

Dear Ms. Romanovsky:

I am Don Koehler, Executive Director of the Georgia Peanut Commission. On behalf of our grower-member board of directors, we appreciate the opportunity to comment regarding the registration review of phorate. Phorate is critical to U.S. peanut production for control of thrips and more importantly control of Tomato Spotted Wilt Virus. There are not adequate alternatives for us to effectively manage Tomato Spotted Wilt Virus so we cannot afford to lose phorate. Our organization represents peanut growers in Georgia. Georgia's growers produce 750,000 acres of peanut on average every year—making peanuts an important source of revenue for the 4,000 family farmers. The peanut industry is a \$2 billion industry in the state of Georgia.

Phorate has consistently been the only insecticide or fungicide capable of managing the devastating effects of Tomato Spotted Wilt Virus. Peanut growers rely on cultural practices as their only other control option for Tomato Spotted Wilt Virus, such as variety selection, planting date, and row spacing. These other control methods are often not able to be implemented due to growing conditions or production practices specific to individual growers. While varieties are available with resistance to Tomato Spotted Wilt Virus, the continued use of those varieties can lead to reduced levels of resistance to the virus.

The wholesale revocation of tolerances for the entire organophosphate class is not a part of a thoughtful scientific process and will likely result in reduced production, loss of farm income, increased risk of insecticide resistance, and reduced ability to respond to emerging insect threats (i.e., invasive species).

We urge the U.S. Environmental Protection Agency to allow phorate products to continue to maintain their federal registrations for peanut. Please contact me should you have any additional questions or concerns.

Sincerely,

Don Koehler
Executive Director
Georgia Peanut Commission



Southern Peanut Growers
www.peanutbutterlovers.com