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September 25, 2022

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

Re: EPA-HQ-OPP-2022-0490,
Petition To Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses

Dear Ms. Romanovsky:

This letter comes in response to the request for comment regarding the Earthjustice Petition, filed on November 18, 2021, for the Environmental Protection Agency (EPA, or the Agency) to take action by October 1, 2022 to revoke all tolerances and cancel all associated registrations for food uses of organophosphates that its risk assessments determine to be unsafe, update its risk assessments to use neurodevelopmental toxicity instead of 10% red blood cell acetylcholinesterase inhibition as a regulatory endpoint that is protective for children, and cancel registrations for uses that have unreasonable adverse effects on workers.

As Chairman of the Agriculture Appropriations Subcommittee and a member of the House Agriculture Committee, I am writing to express my concern for the impact of the adverse consequences should the EPA accede to the petitioners' requests. Peanut and cotton growers in Georgia and across the nation will likely see reduced production and loss of income, and consumers of peanut and cotton products may also see supply and cost effects of this decision as well.

I implore the Agency to continue the thorough registration review process, using sound science, and refuse to circumvent the necessary steps to ensure both the safety and efficacy of pesticide products.

Georgia is the number one producer of peanuts and the number two producer of cotton in the United States, and thrips is arguably the number one enemy of both crops. Thrips are sucking insects that can cause feeding damage, including discoloration, dwarfing, stunting that affects a plant's ability to grow, deformities, and reduced marketability of the crop.

Thrips are the most consistently damaging pest to peanuts, and they infest nearly all cotton acres in Georgia every year. This is the only insect pest for which a preventive insecticide treatment is recommended on cotton, and it is important to note that recent research at the University of Georgia (UGA) confirmed that thrips feeding injury can cause yield loss in peanuts. However, their damage can be much worse when they transmit viruses to plants.

Over 20 plant-infecting viruses are known to be transmitted by thrips, including Tomato spotted wilt virus (TSWV) which causes significant peanut and cotton crop losses. TSWV-resistant cultivars and thrips management are the only way to reduce the risk of virus infection and crop loss.

Phorate (Thimet) is the only insecticide that reduces the risk of TSWV in peanuts, and acephate (Orthene) is the best method of thrips control in cotton.

Therefore, it is highly recommended that peanut growers apply in-furrow phorate treatment at planting, as most thrips management options and all TSWV management options end when the seed furrow closes. Likewise, in-furrow acephate treatment at planting is vital for thrips management in cotton crops. It is not feasible to control thrips with foliar sprays alone.

In-furrow treatments reduce the need for foliar sprays, a major concern raised by the petitioners.

Another concern raised by petitioners includes organophosphate poisoning. Research shows that poisoning most often occurs by intentional ingestion. So, the mental health of farmers is perhaps the issue that should be most at concern here. It is an often-overlooked challenge that farmers face nationwide. Therefore, \$10 million is appropriated each year for the USDA's Farm and Ranch Stress Assistance Network. However, OP poisoning is not EPA's responsibility to address.

Now, our county extension agents and collegiate staff connect farmers with the education, technology, and best practices necessary to produce the best, most affordable, most productive, most efficient crops in the world. Peanut research at Fort Valley State University (FVSU) continues to aid Georgia farmers who face challenges controlling pests, and the FVSU researchers work with entomologists at the USDA-Agricultural Research Service's (ARS) Southeastern Fruit and Tree Nut Research Laboratory in Byron, National Peanut Lab in Dawson, and University of Georgia in Athens.

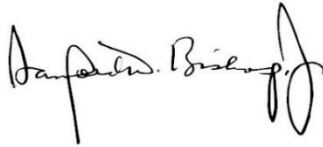
UGA's College of Agricultural and Environmental Sciences creates annual cotton and peanut production guides to help our growers produce the best peanuts and cotton worldwide. The nation's foremost peanut entomologist – Dr. Mark Abney – is at UGA, and I encourage you to read his comments on this docket and contact him to discuss sound science, substantive data, and expert opinions on this matter. Dr. Stanley Culpepper is a great resource there as well, and I encourage you to consult with him and the USDA's National Agriculture Statistics Service chemical usage statistics for "ground truthing" on the application rates for phorate and acephate.

I also want to express my support for the EPA's workplan to balance wildlife protection and responsible pesticide usage. As was mentioned in the workplan, "Without certain pesticide products, farmers could have trouble growing crops that feed Americans and public health agencies could lack the tools needed to combat insect-borne diseases." This is certainly true in this case. Indeed, if an entire class of products is revoked or cancelled all at once, this would leave farmers without the time to develop and find alternatives – for which none currently exist in the case of phorate and acephate.

In closing, I want to thank the Environmental Protection Agency for its transparency in providing the opportunity for the public to weigh in on the Petition To Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses. It is my sincere hope that you will make the best decisions in the name of sound science, good governance, and common sense.

With kindest regards I remain,

Sincerely yours,

A handwritten signature in black ink that reads "Sanford D. Bishop, Jr." The signature is written in a cursive style with a large, stylized initial 'S' and a long, sweeping underline.

Sanford D. Bishop, Jr.
Member of Congress