



September 19, 2022

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

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

Dear Ms. Romanovsky:

The U.S. Peanut Federation (USPF) represents peanut growers, shellers and buying points. Our founding members include the Southern Peanut Farmers Federation (Georgia, Alabama, Florida and Mississippi peanut grower organizations), American Peanut Shellers Association and the National Peanut Buying Points Association.

Our peanut organizations have been discussing the importance of organophosphate insecticides phorate and acephate for insect and disease management for peanuts with their land grant universities. According to the University of Georgia College of Agricultural and Environmental Sciences, “tomato spotted wilt (TSWV) is a serious viral disease of peanut that is transmitted by thrips. Minimizing losses to TSWV involves the use of field resistant cultivars, cultural practices designed to avoid heavy thrips pressure, and phorate. Phorate is the only chemical that consistently reduces the incidence of TSWV in peanut.”

To assure a safe, reliable supply of peanuts, TSWV must be managed during the growing season. It is critically important that there not be a wholesale revocation of tolerances for the entire class of organophosphates. The evaluation of these tolerances should be part of a thoughtful, scientific process. Without this approach, peanut growers will likely face a reduction in production, loss of farm income, increased risk of insecticide resistance and a reduced ability to respond to emerging insect threats, i.e. invasive species.

We ask that the U.S. Environmental Protection Agency continue to allow phorate products to maintain their federal registrations for peanuts. If you have any questions, please feel free to contact me.

Sincerely,

Robert L. Redding, Jr.
President