



Kansas Agribusiness Retailers Association  
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Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460-0001  
Docket ID No: EPA-HQ-OPP-2022-0490

Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>

**Re: Docket ID No. EPA-HQ-OPP-2022-0490. Notice seeking public comment on petition to revoke tolerances and cancel registrations for certain organophosphate uses.**

On July 12, 2022, the United States Environmental Protection Agency (EPA) issued, for public notice seeking comments on a November 18, 2021, petition requesting that EPA revoke all tolerances and cancel all associated registrations for food uses of certain organophosphate pesticides (OPs).

The Kansas Agribusiness Retailers Association (KARA) is a voluntary trade association whose membership includes over 700 agribusiness firms that are primarily retail facilities supplying fertilizers, crop protection chemicals, commercial application services and seed to Kansas farmers. Many KARA members register pesticide products for sale in the state of Kansas. KARA serves as a representative voice for the agribusiness industry to its members, the public, and government. KARA submits these comments in response to the petition.

Kansas is a leading agricultural producer in crops and livestock. The United States Department of Agriculture's (USDA) National Agriculture Statistics Service (NASS) reports 200.9 million bushels of grain sorghum and 686.4 million bushels of corn production in Kansas in 2017. That grain is a significant factor in Kansas livestock and fuel production. In addition, approximately 550 million gallons of ethanol are processed annually in Kansas.

Regulatory actions affecting our agribusiness members affects our industry's ability to serve Kansas farmers.

### **Benefits of Organophosphates in Kansas Agricultural Production**

OPs are one of the few remaining classes of chemistry that are broad-spectrum insecticides. OPs protect crops from a wide range of insects, prolong the life of crops, and increase productivity for many thousands of growers, including those growing a wide variety of minor-use crops.

The products using the active ingredients at issue are essential to the timely availability of safe and effective crop protection; they are essential pest control tools to support sustainable food and fiber production, they

promote international commerce through well-established maximum residue levels, and they combat mosquito- and other insect-borne public health issues that impact all Americans.

Corn and grain sorghum production, which support the grain handling, livestock, and ethanol industries in Kansas, flourishes through the use of crop protection products, such as OPs. These insecticide products have been used extensively in Kansas for control of crop irritants such as grasshoppers, plant bugs, aphids, spider mites, other insect pests, nematodes, rootworm, index liquid rootworm, mosquito and fly control for cattle in feed yards, cotton leaf defoliant, new insect species such as soybean gall midge, and other insect control. Use of OPs allows Kansas crops to maximize yield potential, optimizing overall production efficiency.

The availability of these pesticide products is critical to the management of pesticide resistance. For example, because there are only two classes of chemistry available for adult mosquito control -- the pyrethroids and OPs -- canceling the OPs would cause a collapse of public health mosquito control, as the only means to combat resistance to pyrethroids will have been eliminated. For these reasons, the continued availability of this group of pesticides is crucial.

The ability to use safe and reliable crop input products, such as OPs, at agronomically sound rates, has far reaching implications on the overall grain production, handling, and processing industries. OPs play an important role in the crop production industry, and our members have a strong interest in assuring that this safe product continues to be made available to Kansas farmers.

Removal of this crop protection chemical could potentially cause great harm to, and loss of, Kansas crops such corn, sorghum, and cotton. This would cause a significant economic loss to agriculture and the Kansas economy.

## **Summary**

OPs serve as an important part of modern production agriculture. Industry appreciates the opportunity to comment on this petition. We urge the EPA to deny this petition, and we request the EPA allow continued access to this safe and effective crop protection product.

Thank you for the opportunity to submit these comments and recommendations.

Respectfully,

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