MISSOURI SOYBEANS

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June 29, 2017

Office of Pesticide Programs Regulatory Public Docket
Environmental Protection Agency Docket Center, (28221T)
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

Re: Bifenthrin, 7402 - EPA docket: # EPA-HQ-OPP-2010-0384

Dear Office of Pesticide Programs:

The Missouri Soybean Association (MSA) submits the following comments in response to the recent Environmental Protection Agency (EPA) action on the preliminary risk assessment for Bifenthrin, a pyrethroid class of insecticides.

The MSA strongly supports the EPA's re-registration of Bifenthrin and we oppose any additional EPA label restrictions that would otherwise hinder its continued availability and use by Missouri row crop farmers. Similar to other Midwest states, further restricting Bifenthrin would severely limit, and strike a major blow to grower's pest management toolbox, impacting potentially millions of acres of soybean production in Missouri.

Bifenthrin in Missouri Soybean Production

Bifenthrin has been a safe and effective broad-spectrum insecticide for Missouri farmers controlling a wide range of problem insects. In Missouri soybean production, Bifenthrin has proven extremely effective in controlling bean leaf beetles, stink bugs, Japanese beetles, grasshoppers and soybean aphids. All these pests can result in significant yield loss if left uncontrolled and growers need access to all available cost-effective pest management tools and practices to help control these insects.

While we recognize there are other insecticidal options available, Bifenthrin is an important cost-effective integrated pest management tool for Missouri growers as it offers a different mode of action compared to other options. This is an important consideration as using products with different modes of action is an essential practice to effectively prevent pesticide resistance. Further restricting, or taking effective tools like Bifenthrin out of the hands of farmers, will create other unintended consequences that may be far worse. When cost effective products are removed, it forces growers to rely heavily on one or just a few products, a discouraged practice that can lead to pesticide resistance. EPA can only expect farmers to successfully address pest resistance if they are provided diverse and cost-effective options for pest management.

EPA's Bifenthrin Risk Assessment Process

EPA's latest preliminary risk assessment for the pyrethroid class of insecticides results in probable actions that could severely limit farmers' access to the highly effective Bifenthrin insecticides. We believe, like others, that the EPA has relied on insufficient science in the risk assessment which has resulted in unrealistic conclusions. EPA's risk assessments for pyrethroids and Bifenthrin indicate concerns for aquatic organisms, but the EPA's overly simplistic risk assessment methods don't fully consider the actual chemical characteristics of Bifenthrin. Bifenthrin is hydrophobic, meaning it repels water. The chemical biodegrades in sunlight and binds tightly to soil particles, further limiting its availability to non-target aquatic organisms

in their natural environments. EPA's laboratory studies don't take these qualities into consideration, thereby exaggerating the environmental impacts of Bifenthrin and ultimately resulting in unrealistic outcomes.

Missouri soybean farmers rely on up-to-date sound science and realistic based decision making each and every day in their operation--we believe the EPA should too. Missouri farmers employ increasingly sophisticated precision agriculture systems designed to maximize the efficiency of crop inputs. They utilize plant seeds enhanced with biotech traits to increase yields and decrease crop chemical applications. By using soil and water conservation practices, farmers conserve soil, water and natural resources. For farmers, the application of cutting-edge science, forward thinking and the drive for continual improvement shapes not only the decisions and outcomes on the farm, but also make possible the abundant and affordable food supply we all benefit from. Since farmers are committed to taking sound science so seriously, we feel the agencies that regulate farmers should too.

Poorly conceived actions by the EPA needlessly presents farmers and the crop industry a constantly moving target, increasing the uncertainty around the availability of crop protection tools and products. This places an unnecessary economic burden on farmers as Bifenthrin, as well as other products, play a key role in whether Missouri soybean farmers are able to produce a profitable crop.

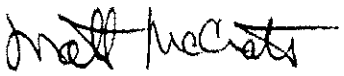
Conclusion

Missouri farmers must have available a robust and diverse toolbox of pest control tools. Without these tools, the EPA stands to set farmers up for certain failure on both agronomic production as well as environmental and pesticide stewardship. The implications of the EPA's pesticide related policy decisions, such as the re-registration of Bifenthrin, along with other crop protection products, are far-reaching and significant. EPA's pesticide registration policy must be an "all the above" strategy to enable farmers to properly and effectively address today's challenging issues.

It is imperative that the EPA address the many comments and concerns the agricultural community has raised on the preliminary risk assessment for Bifenthrin. The potential impacts of getting this decision wrong are far-reaching and will make achieving other agronomic and stewardship goals much more difficult.

Thank you for considering these comments.

Sincerely,



Matt McCrate, President
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