



## TENNESSEE FARM BUREAU FEDERATION

---

July 11, 2024

Mr. Timothy Kiely  
Acting Director  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**Re: Pesticide Registration Review: Proposed Decisions for Several Pesticides (Acephate) (EPAHQ-OPP-2008-0915-0058)**

Dear Acting Director Kiely:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the Proposed Interim Decision (PID) for the registration review for acephate. On behalf of our member producers, we are concerned about the PID to vacate most approved uses of the pesticide acephate.

TFBF is a general farm organization of over 694,000 members whose purpose is to represent the many diverse commodity producers across Tennessee. TFBF policy is developed through a grassroots network of members who identify, research, deliberate, vote on, and adopt policies on various issues, including responsible crop protection products. Acephate is an organophosphate insecticide commonly used on soybeans, cotton, tobacco, specialty crops, nursery crops, and sod and turf.

On April 30, 2024, the Environmental Protection Agency (EPA) announced a PID to vacate all uses of the pesticide acephate, except for use in tree injections. This decision results from EPA's updated human health risk assessment and drinking water assessment highlighting drinking water risks. While we acknowledge EPA's duty to conduct risk assessments on all registered pesticides, TFBF is concerned about the impact vacating crop uses of acephate will have on the varied commodity producers in Tennessee. The absence of this insecticide would remove a crucial component in a grower's options for crop protections.

Farmers take pride in being stewards of the land bestowed upon them to produce the world's food, fuel, and fiber. Farmers use many tools, including pesticides, to help

protect and grow top-quality, high-yielding crops. TFBF urges EPA to reconsider the PID to vacate almost all uses of acephate and work with stakeholders to find workable solutions to address human health risks while also supporting production agriculture.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry". The signature is written in black ink and is positioned below the word "Sincerely,".

Eric Mayberry  
President  
Tennessee Farm Bureau Federation