



TENNESSEE FARM BUREAU FEDERATION

March 24, 2025

Edward Messina
Director, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket No. EPA-HQ-OPP-2024-0431; Chlorpyrifos Tolerance Revocation

Dear Director Messina:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed rule to revoke most tolerances of chlorpyrifos. TFBF is a general farm organization of over 695,000 members whose purpose is to represent the widely diverse commodity producers across Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on numerous issues related to agriculture and rural living. On behalf of our member producers, we oppose revoking chlorpyrifos tolerances for most crops.

Responsible use of crop protection products is a foundational component of a farmers' daily use of best management practices. We strongly oppose the curtailment of the proper use of crop protection products. Environmental regulations should consider the essential nature of efficient and safe use of pesticides as a basic and integral part of agricultural production.

Chlorpyrifos is a critical insecticide used by many farmers to protect their crops against harmful insects. This product has been an important tool for farmers for over 50 years, being a safe, effective, affordable, and reliable option for crop protection. To that end, the success of chlorpyrifos extends to more than 50 different crops in over 98 countries across the world. When used according to the label, the success of this product speaks for itself in its ability to protect against insect pest threats.

In Tennessee, chlorpyrifos is relied upon by a multitude of different commodity producers. Producers of soybeans, sorghum, cotton, alfalfa, and Bermuda grass commonly rely on it to defend against insect infestations. Tennessee also has a large nursery crop industry, and chlorpyrifos is vital when treating ball and burlap trees and

shrubs from the Japanese beetle as part of the harmonization plan which allows for treated plants to be shipped to states that do not have Japanese beetles. Chlorpyrifos is also used to protect the bark of cherry, almond, nectarine, peach, plum, and apple trees from borers and is an important tool for turfgrass grown for sod.

While we recognize EPA's responsibility to acknowledge all risks related to pesticides, EPA **must** also properly affirm the benefits chlorpyrifos provide to a wide array of crops. Similarly, it is imperative for EPA to consider the impacts of removing a product like chlorpyrifos from the market as seriously as they recognize its perceived risks. By their own admission, in a study conducted in 2020¹, EPA estimated the total annual economic benefit of chlorpyrifos to crop production as high as \$130 million. Given the inflated state of the economy since then, this number is likely significantly higher today. Today, farmers are already facing significant economic pressures from high input costs to low prices which are failing to meet those costs. The economic impacts of products like chlorpyrifos play an even larger role than they did even a few years ago. Making decisions affecting a farmer's bottom line, such as removing the use of chlorpyrifos and replacing it with a costlier option, may result in a farmer's ability to stay in business. EPA is obligated to take these factors into consideration and recognize the larger impacts to the food supply when taking away important tools from farmers.

Additionally, farmers need every tool available to them to combat insect infestations. Simply asserting that farmers have other options available to them to replace chlorpyrifos and new products may be registered in the future as a reason to discredit the overall impact of removing it from the market does not accurately depict the subsequent impacts. First, sacrificing the superior efficacy of chlorpyrifos by using other products increases the risk of pest resistance to crop protection products. Second, the registration process for a potential future alternative is a long process which takes time to complete, especially when EPA is considering major changes to the registration and review process related to the Endangered Species Act. Both these factors should be considered when making decisions about the impact of revoking chlorpyrifos tolerances.

Throughout their risk assessment, EPA emphasizes the risks to humans from exposure to residues in drinking water. However, they fail to account for all the conservation practices farmers across the country actively participate in to significantly reduce runoff impacts. One important example specific to Tennessee is the high rate of adoption of no-till, conservation tillage, and use of cover crops. According to University of Tennessee Institute of Agriculture's 2024 Nutrient Management Report, over 85 percent

¹ "Revised Benefits of Agricultural Uses of Chlorpyrifos (PC# 059101); Docket No. EPA-HQ-OPP-2008-0850-0969; *United States Environmental Protection Agency*; November 19, 2020; [Regulations.gov](https://www.regulations.gov)

of farmers use no-till or conservation tillage and 53 percent utilize cover crops. These practices play a crucial role in reducing runoff impact into water sources, therefore, minimizing the resulting risk to humans.

Chlorpyrifos plays a crucial role in a farmer's crop protection program. While TFBF understands the importance of evaluating risks of pesticides, we must not lose sight of the critical need for these products in the success of the overall food supply. While this decision is specific to chlorpyrifos, EPA cannot forget the larger impacts that decisions they make for chlorpyrifos have on other critically important pesticide products. Because of this, we urge EPA to reconsider the revocation of most tolerance of chlorpyrifos.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation