

Message

From: Paul Schlegel [pauls@fb.org]
Sent: 8/15/2018 7:23:40 PM
To: Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, E]
Subject: Chlorpyrifos
Attachments: Comment.pdf; pesticides-AFBFComments16a.0104.docx

Importance: High

Tate --

In the wake of the 9th Circuit ruling on chlorpyrifos last week, we asked our state farm bureaus to assess the potential impact of the loss of this product for farmers. I'm setting out below a few of the responses we have already received. I expect we will be receiving more in coming days and weeks. To put it bluntly, most of our members who rely on this product are extremely concerned about the ramifications of the court decision:

- Florida is greatly concerned about the potential impact of its loss, particularly as it is one of the critical tools available to the citrus industry in combating citrus greening. That disease alone has devastated the Florida citrus industry and losing chlorpyrifos would greatly hamper their efforts to combat the disease.
- Michigan Farm Bureau has indicated that losing chlorpyrifos would be devastating to specialty crop growers in that state. Currently, the pesticide is used on approximately:
 - 32,000 acre of cherries
 - 32,000 acres of apples
 - 9,000 acres of peaches

It is primarily used as a trunk application for the protection against borers (normally one application per season). As of today, there are no affordable alternatives to the product.

- Maryland orchardists currently rely on chlorpyrifos as a defense against peach tree borer. Because of its ability to kills egg masses on woody surfaces, they are hopeful it can be a major player in controlling the Spotted Lanternfly that has invaded Southeast PA and could move into Northeast Maryland in the near future. If it does kill the over-wintering egg masses, it could be one of the only pesticides out there to control the pest outside of the growing season. Maryland Department of Agriculture indicates that only about 3,000 lbs. of the pesticide was used annually in the state -- a reduction attributed primarily to the expanded use of Bt corn.
- Texas producers employ chlorpyrifos as one tool to help combat insect infestations; by offering a different mode of action, it helps producers in protecting their crops. The main crops that it is used on in Texas are winter wheat and pecans due to its effectiveness of controlling certain insect populations. Other crops for which it is used include:
 - Corn – not used as widely due to Bt traits in corn.
 - Cotton – used in cotton, but use varies. Not the number one insecticide used, but used for resistance management.
 - Citrus – use has declined in citrus, but still used.
 - Sorghum – again, not the number one insecticide used, but is one more 'tool in the tool box'
 - Peanuts – used to control corn rootworm on peanuts in Texas.
 - Pecans – widely used in pecans.
 - Wheat – Widely used in wheat during the winter months.
- California estimates that the loss of chlorpyrifos would lead to higher uses of pyrethroids and neonicotinoids, which are already under scrutiny. As dependence on those products goes up, so does the risk for resistance and damage from pests and diseases.

I am also attaching a couple of documents I hope will be helpful. One is comments from California Farm Bureau outlining in greater detail usage of chlorpyrifos in that state. The other is comments filed by American Farm Bureau

which gives a broader overview, from a national perspective, on the importance of the product to a wide range of crops and why it is important to maintain its availability.

Thanks for your attention to this matter. Please let me know if I can provide any further information.

Paul

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