

Agricultural Stakeholders Tell EPA Why They Need Chlorpyrifos Uses Retained

Continued access to the insecticide chlorpyrifos is important for successful production of a wide range of U.S. crops, according to public comments submitted by agricultural stakeholders on a preliminary EPA chlorpyrifos regulatory assessment released during July of 2011. Comments are summarized below with links provided to full copies of the submitted comments.

“All chlorpyrifos products represent a critical insect management tool for growers of soybeans, wheat, alfalfa, citrus, tree nuts, peanuts, vegetables and other crops,” according to an October submission to the EPA docket by the [American Farm Bureau Federation](#). Focusing specifically on only a half a dozen U.S. crops, the Farm Bureau submission identifies chlorpyrifos as an important tool for controlling more than 30 different economic crop pests.

Other stakeholders cited many benefits offered by chlorpyrifos for specific agricultural commodities.

- **Citrus:** Chlorpyrifos protects citrus from [California red scale](#) and citricola scale with typically only one application per year, according to an October submission from the [California Citrus Mutual](#), a nonprofit grower organization (The [University of California at Davis](#) estimates the total value of the annual California citrus crop at \$889 million.)
- **Grapes and Tree Fruit:** Chlorpyrifos also provides important control in vineyards and orchards against vine and [grape mealybug](#) and black widow spiders, according to a September submission of The [California Grape and Tree Fruit League](#), another grower organization. Use of chlorpyrifos in rotation with other control methods is also very important for preventing insect resistance, the League notes.
- **Soybeans:** Chlorpyrifos provides effective control of grasshoppers, spider mites and other pests of soybeans, according to the [American Soybean Association](#). The product is also important to combating the increasing presence of soybean aphid in key soybean-producing areas, according to the [Farm Bureau](#) submission. (The American Soybean Association estimates the total value of the annual U.S. soybean crop at in excess of \$31 billion.)
- **Cranberries:** Chlorpyrifos is considered the “workhorse” by the cranberry industry for protection against the black-headed fireworm, cranberry fruitworm and cranberry weevil, according to an October submission by the [Cranberry Institute](#). (The Cranberry Institute estimates the total value of the annual U.S. cranberry crop at in excess of \$211 million.)
- **Sugarbeets:** Loss of chlorpyrifos would be “detrimental to continued successful production of sugarbeets in areas where the [sugarbeet root maggot](#) is most prevalent,” according to an October submission by the [American Crystal Sugar Company](#). Alternative products, the submission notes, are often less effective and pose greater environmental risk.

The broad-spectrum pest protection offered by chlorpyrifos is also important for growers of crops for export, according to a September submission by [Washington Friends of Farms and](#)

[Forests](#), a local alliance of key state commodity groups and crop consultants. Shiploads of produce containing prescribed pests can be rejected by importing nations, resulting in an infested shipment rotting on the docks or in transit to a new destination. Failure to provide reliable control of key pests poses “huge risks” for agricultural stakeholders, the organization says.

Growers clearly need a trusted, well-established product to protect a wide range of crops from a diverse spectrum of damaging pests. As a highly effective, well-studied crop protection product with regulatory authorizations in most countries for use on most crops, chlorpyrifos meets that pressing need. Dow AgroSciences supports chlorpyrifos for use in U.S. agriculture and will continue to work with EPA to address requirements for high-quality health, safety and environmental data to meet the needs of the Agency’s ongoing regulatory review process.

About Chlorpyrifos

The insecticide chlorpyrifos is one of the most widely used crop protection products in the world. It has been on the market for 40 years and is currently registered in more than 100 nations. Chlorpyrifos protects many fruit, nut, vegetable and grain crops from destructive pests; and the product has been determined by regulatory authorities to pose negligible risk with authorized use. Chlorpyrifos is registered for use in most developed nations, including Australia, Canada, France, Italy, Japan, New Zealand, Spain, the United Kingdom and the U.S. The product has been extensively researched, and its labeled uses are supported by more than 3,600 studies and reports. No crop protection product has been more thoroughly studied.