



July 21, 2017

Office of Pesticide Program Docket  
Environmental Protection Agency Docket Center  
1200 Pennsylvania Ave NW  
Washington, DC 20460-0001

RE: Docket ID EPA-HQ-OPP-2010-0119-0046

To Whom it May Concern:

Thank you for the opportunity to comment on the use of Chlorpyrifos-methyl on wheat (Docket Number: EPA-HQ-OPP-2010-0119-0046). The National Association of Wheat Growers (NAWG) appreciates the opportunity to comment on the registration review of Chlorpyrifos-methyl. NAWG is a federation of 22 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research and sustainability.

Chlorpyrifos-methyl is used by our members when storing wheat. Chlorpyrifos-methyl provides protection against insect damage while wheat is stored on-farm. Growers use this product according to the label requirements and find it to be a safe and effective product. NAWG is concerned that effective products that are regularly used by farmers might be removed from the market to focus on newer chemistries. While we support new product development, it is important that growers have options that are efficient and cost effective. Producers need a variety of options for pest control and effective products should not be removed from the market. It is important that growers have continued access to different classes of chemical.

We are very concerned that EPA's action could result in canceling the use of Chlorpyrifos-methyl on stored wheat. This product is cost effective and necessary to treat for weevils and other pests that would otherwise render wheat unacceptable for milling and leave growers with a crop that they cannot sell for milling.

Chlorpyrifos-methyl is currently used by wheat growers across the country and NAWG supports the continued registration and use of this product on stored wheat. NAWG requests that you allow for the continued use of Chlorpyrifos-methyl on stored grain.

Thank you for this opportunity to provide comments and we are happy to address any questions they agency may have.

Sincerely,

David Schemm  
President