National Association of Wheat Growers
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June 15, 2017

Yu-Ting Guilaran
Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency

RE: Registration Review Draft Risk Assessments of Pyrethroid Insecticides

EPA Docket ID: EPA-HQ-OPP-2010-0228-0019

Dear Ms. Guilaran:

Thank you for the opportunity to comment on the registration review draft risk assessments of pyrethroid insecticides. The National Association of Wheat Growers (NAWG) is a federation of 20 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.

Pyrethroids play a critical role in pest management for wheat farmers and have several benefits. There are several pyrethroids registered for use on wheat. These pyrethroids allow for farmers around the country to control for pests such as fall army worms, grasshoppers, and cereal leaf beetles. Pyrethroids provide control of pests in an economical way that have few or no other pesticide alternatives and serve as an important tool in insecticide resistance management programs and integrated pest management programs.

Beyond, the critical role pyrethroids play in pest management, they don't cause adverse ecological effects when used under real-world conditions according to federally approved labels. The nature of pyrethroid chemistry makes these insecticides less of a hazard as compared to other pesticides. Pyrethroids are extremely hydrophobic and tend to avoid being in the water phase and readily stick to organic material, suspended particles, and sediment. Additionally, pyrethroids are rapidly broken down by aquatic organisms and therefore they do not bioaccumulate.

NAWG is concerned that the EPA screening-level preliminary ecological risk assessment for pyrethroid insecticides is overly conservative and does not consider the best available science. NAWG encourages the EPA to review the multiple high-quality studies and peer reviewed scientific publications provided by the Pyrethroid Working Group. The unique properties of pyrethroids, particularly the extreme hydrophobicity allowing for limited solubility in water, must be considered.

Moreover, NAWG would encourage the EPA to consider the use of scientifically appropriate methods to refine their assessments that are in line with Agency policy. The use of the extensive toxicological dataset as opposed only to the most sensitive species, the inclusion of the EPA-mandated label requirement for Vegetative Buffer Strips, and the inclusion of more realistic agronomic parameters, including percent cropped area and percent crop treated, all would help to refine the risk assessment. Additionally, the Agency's assessment failed to consider restrictions already required on labels that further mitigate harmful ecological impacts.

NAWG members rely on pyrethroids as part of their crop management practices, playing a critical role in controlling pests. When used under real-world conditions and according to federally approved labels, adverse ecological effects are minimized. NAWG encourages the EPA to refine their risk assessment to account for the agronomic reality in which they are used and to use the most up-to-date scientific literature and methods to make the assessment. Wheat farmers do not need more restrictions on a key management tool, especially in light of the current stressed farm economy.

Thank you for allowing NAWG to provide comments on the registration review draft risk assessments of pyrethroid insecticide and to provide recommendations on way to refine and better the assessment. We look forward to working with you on this important issue.

Sincerely,

David Schemm
President
National Association of Wheat Growers