



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

January 5, 2016

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

RE: Docket ID no. EPA-HQ-OPP-2015-0653

RIN: Not assigned

To Whom It May Concern:

New York Farm Bureau (NYFB), New York's largest general farm organization, appreciates the opportunity to submit these comments to the above-referenced docket, in which EPA proposes to revoke all tolerances for chlorpyrifos. NYFB strongly opposes the agency's proposed action and requests that these comments be considered by the EPA as it considers a final decision on this matter.

NYFB is concerned that it appears that the EPA's proposal is a retreat from its statutory obligation that, when evaluating pesticides for registration, it balances the risk of those active ingredients against their benefits to farmers specifically, and to the public generally, and when they do not pose an unreasonable risk to health or the environment. Chlorpyrifos is a compound that has been widely used for decades, we believe its efficacy and safety when used as directed are amply demonstrated not just in the literature but in the experience of the agricultural sector. This pesticide is widely used in over fifty different crops in more than ninety-eight countries that rely on chlorpyrifos products to help defend against harmful crop failure from a wide array of insect pests. In New York, chlorpyrifos remains an important tool specifically for our onion, cabbage, and sweet corn, as well as other crops.

Onion

Onions are one of the most important vegetable crops in New York State in terms of crop value. New York ranks 4th in the nation in onion production volume and has over ten-thousand acres planted in New York with a cash value of over \$52 million.

Onions in New York are mostly produced on muck (high organic matter) soils. Cost of production is higher for onions than any other vegetable crop in New York. Several insects and numerous diseases attack onions and the control of these currently relies on the frequent use of pesticides, including chlorpyrifos. Chlorpyrifos is effective at controlling the onion maggot.

According to the Cornell Cooperative Extension publication, "Crop Profile: Onions in New York" (<http://pmep.cce.cornell.edu/fqpa/crop-profiles/onion.html>), "without the registration of new effective materials to replace them, the loss of chlorpyrifos (for onion maggot control)... would have significant impacts on production and profitability."

Crop Profile continues, "onion maggot larvae feed on the below grown hypocotyl tissue of seedlings, resulting in a variety of damaging symptoms. Larval feeding may kill seedlings; therefore, poor plant

stands may indicate an onion maggot problem. In larger plants, larvae may tunnel into the bulb causing the plants to become flaccid and yellow. Later generations damage bulbs, often causing them to rot, and rendering them unfit for sale or consumption.” The percentage of acres affected according to this publication is 100%.

According to this publication, 95% of the onions produced in New York have been treated with chlorpyrifos. The onion industry is in need of effective alternatives to chlorpyrifos, and until at least two are registered and available for use, producers must depend on chlorpyrifos for onion and maggot control.

The restriction of this product without any viable alternatives, would put many if not all onion growers out of business.

Cabbage

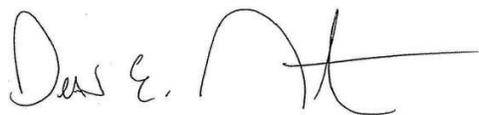
Another important use of chlorpyrifos is for the control of cabbage maggot and aphids in cruciferous vegetables. New York ranks number one in the country for production of fresh cabbage, number two in processing cabbage and third in fresh cauliflower production. Valued at over \$62 million per year, cabbage and other cruciferous (broccoli, cauliflower, Brussels sprouts, radishes, kale, collards, turnips, rutabagas, etc.) rank second in economic importance in New York, just after potatoes. Furthermore, cabbage represents the great majority (eighty-four percent) of acres planted of cruciferous vegetables.

These crops are attacked by a wide variety of pests, and pest management is complex and costly for these extremely important vegetable crops. Like with the onion crop, without the registration of new effective materials to replace them, the loss of chlorpyrifos, would have significant impacts on production and profitability.

Many farmers in New York participate in Cornell Cooperative Extension’s Integrated Pest Management Program (IPM). According to Cornell Cooperative Extension Crop Profile the “Use of Chlorpyrifos...is consistent with Cornell IMP recommendations.” If chlorpyrifos use was to be eliminated or severely restricted, the impact to farmers would be significant in terms of reduced efficacy of pest management programs, increase costs to growers switching to more expensive, more frequently applied and less effective alternatives, disruption to current and historical IPM programs and as mentioned before, substantial losses due to reduced crop yield. To reiterate, for many of the pests targeted by chlorpyrifos, there is a lack of effective alternative targeting control of primary pests, such as the onion maggot or cabbage maggot, this presents a serious concern of the economic damage if pests are left uncontrolled.

Therefore NYFB strongly requests the agency not pursue this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean E. Norton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dean E. Norton
President