



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

October 6, 2017

Mr. Donald Bice
Acting Deputy Assistant Secretary for Administration
Office of Budget and Program Analysis
United States Department of Agriculture
Jamie L. Whitten Building, Room 101-A
1400 Independence Avenue, SW
Washington, D.C. 20250

Submitted electronically via www.regulations.gov

Re: Improving Customer Service-Request for Information; Docket ID: USDA-2017-0003-0001; FR Doc. 2017-19337; 82 Fed. Reg. 42781 (September 7, 2017)

Dear Mr. Bice:

The Pesticide Policy Coalition (PPC or “the Coalition”) is pleased to submit comments in response to the United States Department of Agriculture (USDA)’s request for input regarding its proposed reorganization announced in the Federal Register on September 7, 2017 (82 Fed. Reg. 42781). This request for input references the March 13, 2017 Executive Order 13781, “Comprehensive Plan for Reorganizing the Executive Branch” and Secretary Purdue’s authority to reorganize the Department under section 4(a) of the Reorganization Plan No. 2 of 1953.

PPC is an organization of food, agriculture, forestry, pest management and related industries, including small businesses/entities, which support transparent, fair and science-based regulation of pest management products. PPC members include: nationwide and regional farm, commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators and distributors; pest-and vector-control operators; research organizations; and other interested stakeholders. PPC serves as a forum for the review, discussion, development and advocacy around pest management regulation and policy.

PPC members depend on the timely availability of safe and effective crop protection and pest control tools to support sustainable food and fiber production, and to combat mosquito and other insect-borne public health issues which impact all Americans. The availability of a variety of pesticide products is also a critical component in the management of pesticide resistance. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) established a rigorous, science-based, and risk-balancing process for the U.S. Environmental Protection Agency (EPA)’s review

{01041.001 / 111 / 00222313.DOCX 2}

and approval of pesticides. This registration process also establishes “tolerances” for pesticide residues on crops via regulations promulgated under the Federal Food, Drug, and Cosmetic Act (FFDCA). USDA’s Office of Pesticide Management Policy (OPMP) plays a critical role in the pesticide regulatory process by providing technical expertise and support to EPA, including accurate data on pesticide use and practices which account for U.S. modern agricultural practices. OPMP also facilitates the development of new pest management approaches that meet the needs of an evolving and sustainable agricultural system. Unfortunately, over the past several years, declining coordination between OPMP and EPA has greatly diminished USDA’s input in the pesticide regulatory process, and the registration process has suffered overall as a result.

The PPC strongly supports Secretary Perdue’s proposal to move OPMP to USDA’s Office of the Chief Economist. This reorganization underscores the importance of crop protection tools to the U.S. economy and agricultural production. From this elevated position within the Department, USDA can once again play a meaningful role in the establishment of sound pesticide policies and in federal regulatory actions that will impact the availability of critical crop protection tools.

The PPC encourages USDA and Secretary Perdue to also consider any input on the Department’s reorganization and enhanced customer service efforts provided by the Coalition’s member organizations and their members. A complete list of the Coalition’s member organizations is available at www.pesticidepolicycoalition.org.

Sincerely,



Renée Munasifi
Chair, Pesticide Policy Coalition



Beau Greenwood
Vice Chair, Pesticide Policy Coalition