



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

January 13, 2017

President-Elect Donald J. Trump
Trump-Pence Transition Team
Chairman
1717 Pennsylvania Avenue, NW
Washington, DC 20006

And

Trump Tower
725 5th Avenue
New York, NY 10022

Dear President-Elect Trump:

The members of the Pesticide Policy Coalition (“PPC”) respectfully transmit our plan and proposal to effectively integrate the requirements of the federal pesticide registration statute and the Endangered Species Act (“ESA”). All of these changes can be accomplished within existing law and regulation creating significantly improved performance in the first 100 days of the Trump Administration. We share the concerns outlined in CropLife America’s document, *“Avoiding Significant Disruption of EPA’s Pesticide Program from Integration of ESA and FIFRA Requirements in Pesticide Registration Decisions”* shared earlier with the transition team that outlines the background and concerns in greater detail. The PPC reiterates the action plan shared on the following pages.

PPC is an organization of food, agriculture, forestry, pest management and related industries that 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.

As you know, America’s farmers don’t achieve the biggest yield per acre by simply planting seeds and watching them grow. There are some natural challenges, like pests and crop diseases that can wreak havoc on a field’s productivity causing farms to lose 30 to 40 percent of crops due to pests and diseases. Similarly, specialty pesticide applicators and end-users such as homeowners, public health officials and others suffer when these two statutes – ESA and the Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”) - fail to effectively integrate. We are committed to the environmental sustainability of U.S. agriculture, maintaining and improving agricultural productivity and protecting public health, but we need common sense regulations to do it.



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The enclosed PPC Action Plan describes initial steps that the Trump Administration can take *immediately* to advance a workable integration of the requirements of the Federal Insecticide, Fungicide, and Rodenticide Act and the Endangered Species Act - one that meets the goals of both statutes and ensures that agricultural producers and specialty pesticide users continue to have access to the products they need to maintain and increase agricultural productivity and protect public health. These policy changes can help the Trump Administration implement workable solutions to the long-standing management problems in FIFRA/ESA integration to ensure greater agricultural productivity through common sense problem solving.

Sincerely,

Ethan Matthews
Chair, Pesticide Policy Coalition

Beau Greenwood
Vice Chair, Pesticide Policy Coalition