

March 4, 2020

To whom it may concern:

The American Farm Bureau Federation (AFBF) is the nation's largest general farm organization. We represent farmers and ranchers in all fifty states and Puerto Rico, who are engaged in every conceivable facet of agricultural production. Farm Bureau's member-controlled, grassroots policy development process is a point of pride and a true example of democracy in action. Every one of the more than 2,800 county Farm Bureaus has member-written and approved policies to guide their local agenda. Similarly, Farm Bureaus in every state and Puerto Rico have policies to direct their actions.

AFBF has specific policy speaking to the availability of pesticides, like chlorpyrifos, to farmers. Specifically, AFBF policy states that:

"We believe implementation of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) should be based on credible scientific information in order to benefit farmers, the environment and the public and should be the sole federal regulatory authority over pesticides."

Pesticides such as chlorpyrifos provide critical risk management tools to farmers and others by helping improve food production, protect health and safety, and ensure a vital and productive supply of food and fiber to our nation and world markets. For many invasive pests, growers face limited or no viable alternative pesticides. When an outbreak of a new pest occurs, users look to chlorpyrifos as a proven first line of defense.

EPA should base its decisions on sound science, while growers employing EPA-regulated pesticides should follow label directions in their use. Based on EPA's ongoing oversight of chlorpyrifos, AFBF supports its continued availability to farmers and its use according to label directions approved by the agency.

Sincerely,



Paul Schlegel
Vice President, Public Affairs