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July 7, 2017

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

RE: Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and Pyrethrins; Docket ID No. EPA-HQ-OPP-2012-0501-0021

Dear Sir or Madam:

The US Canola Association (USCA) writes to submit comments on Docket No. EPA-HQ-OPP-2012-0501-0021, "Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and Pyrethrins." USCA appreciates the opportunity to offer comments encouraging the continued registration of pyrethroids and pyrethrins.

The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. Since USCA's establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to over 2.16 million acres in 2017.

Pyrethroids are the most widely used class of foliar insecticides by U.S. canola growers for the control of aphids, bertha armyworms, cutworms, diamondback moths, flea beetles, grasshoppers, and lygus bugs. USCA is concerned that EPA's preliminary risk assessment would limit the availability of pyrethroid products. We encourage the EPA to revise the risk assessment to both meet the risk-benefit balance required under FIFRA and consider the role of pyrethroids in resistance management.

EPA's decision on this important pesticide tool should be based on sound science and evaluated in the context of actual on-the-ground risk. The pesticide registration review process established under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requires the EPA to engage in a risk-benefit analysis as well as an ecological risk assessment to ensure that properly used pesticides are not likely to cause harmful effects to terrestrial and aquatic life. USCA is concerned that EPA's review does not reflect FIFRA's risk-benefit balance and overstates risk by ignoring real field conditions.

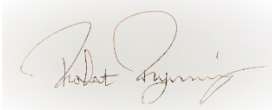
For example, EPA's standard risk assessment approach does not take into account that pyrethroids are hydrophobic, meaning they have low solubility in water; this is a unique chemical property that is ecologically beneficial. When pyrethroids are applied to crops, residues are absorbed into organic matter and soil, leaving only a small amount that could be considered run-off that makes its way to bodies of water or impacts wildlife. EPA did not consider these unique properties and should revise the ecological risk assessment to use best available science that takes the behaviors of these chemical properties into account.

Furthermore, the modeling used by EPA relies on a flawed approach that does not reflect conditions that would be found during normal agronomic operations. Laboratory conditions do not always accurately reflect what will happen in the field and EPA should take into account data that predicts the real outcome of the impact on wildlife. EPA itself has acknowledged that the laboratory findings of the impact of pyrethroids on aquatic life and actual real field conditions could differ by a factor of 550. With such a large discrepancy between predicted and actual outcomes, EPA needs to adjust its assumptions to accurately reflect the risk.

Each year canola producers face multiple challenges ranging from poor weather conditions to pests and diseases. To meet these challenges, producers use multiple modes of action in rotation with other insecticides to reduce the likelihood of insects developing resistance to any one pesticide. Without pyrethroids, producers would be limited in their ability to effectively manage pests and would have to rely on the remaining registered insecticides more heavily, accelerating resistance problems. However, the EPA's risk assessment does not account for the role of pyrethroids in managing resistance.

USCA recognizes and appreciates EPA's role in ensuring that we produce agricultural products responsibly to protect our environment. However, we urge the EPA to refine its registration review of pyrethroids and pyrethrins to take the aforementioned factors into consideration.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Rob Rynning", is shown within a light gray rectangular box.

Rob Rynning
President, US Canola Association