



January 17, 2017

Richard P. Keigwin, Jr.
Acting Director, Office of Pesticide Programs
C/o OPP Docket
Environmental Protection Agency Docket Center (EPA/DC), (28221T)
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460-0001

**Re: Chlorpyrifos; Tolerance Revocations; Proposed Rule.
Docket ID No. EPA-HQ-OPP-2015-0653**

Dear Mr. Keigwin:

The National Sorghum Producers appreciates the opportunity to comment on the U.S. Environmental Protection Agency's proposed tolerance revocation of chlorpyrifos (EPA-HQ-OPP-2015-0653). NSP is an agricultural commodity organization that represents sorghum farmers nationwide on regulatory and legislative issues. NSP serves as the voice of the sorghum industry, which includes 50,000 sorghum farmers across every state in the continental U.S. with 7.2 million acres planted in 2016.

Chlorpyrifos, in its various formulations, is a vital tool used in rotation to control damaging pests including sorghum midge, various aphid species, sorghum webworm and headworm. These products provide a low-cost mode of action, necessary for lower input crops like sorghum. In addition, its short residual activity makes it among the more environmentally safe products, especially in the semi-arid conditions in which sorghum is often grown.

Sorghum farmers understand the need to balance risk and benefits. As suggested above and by others who have commented in this docket, the benefits of chlorpyrifos are clear and the extensive laboratory animal exposure studies strongly point to a reduced risk product that should remain in the toolbox of American farmers.

The EPA's decision to pivot towards and emphasize the findings suggested in a few epidemiological papers, which were overwhelmingly criticized during the Agency's Scientific Advisory Panel is difficult to comprehend. This shift, coupled with the decision to increase the Food Quality Protection Act (FQPA) safety factor due to the results of an unrefined water model, have stacked the cards against chlorpyrifos. The EPA's current approach to this issue is



a significant departure from decades of practice and has the potential to irrevocably impact American farmers' ability to produce abundant food safely. Perhaps the epidemiological studies could bring added value to risk assessments, but the EPA did not evaluate or provide the raw data from those studies. The lack of this information brings into question the veracity of the data and methods of collection. We strongly request the EPA reconsider the flawed approach currently employed and return to good laboratory practice (GLP) animal toxicology studies, which have a long and reliable history of use in EPA regulatory decisions.

We strongly recommend the EPA reject the petition submitted years ago by activist organizations and instead go through a full vetting of chlorpyrifos using the re-registration review process. The proposed cancellation of tolerances, in this manner, gives the appearance of an effort to bypass the registration cancellation procedures contained in Section 6 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended. We request the agency use the best and most sound science to evaluate and decide on this important crop protection tool.

Thank you again for the opportunity to comment and please feel free to contact us with any questions you may have.

Regards,

A handwritten signature in black ink that reads "Donald W. Bloss". The signature is written in a cursive, flowing style.

Don Bloss
Chairman
National Sorghum Producers