MCFA

Minor Crop Farmer Alliance

March 24, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Administrator Zeldin,

On behalf of the members of the Minor Crop Farmer Alliance (MCFA) and other members of the agricultural community, this is to express our strong support for ensuring that the Office of Pesticide Programs (OPP), within the Office of Pollution Prevention and Toxic Substances (OPPTS), U.S. Environmental Protection Agency ("Agency") has the necessary resources, including knowledgeable personnel and funding, to effectively carry out its responsibilities in regulating pesticide chemicals including active ingredients, under the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA). These chemicals are foundational components of our members' integrated pest control strategies necessary to provide a safe, plentiful, affordable supply to our Nation as well as globally.

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers and processors of various agricultural commodities, including food, fiber, turf grass, nursery and landscape crops, and organizations involved with public health pesticides. MCFA's members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators, workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans and non-target organisms such as pollinators. While our commodities are often called "minor crops" or "specialty crops," they contribute to the diverse and highly nutritious diets available for the global population, and to safe and aesthetic surroundings for our homes, schools, and places of business. These U.S. farmers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery and turf grass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than $60 billion, or approximately 40% of total U.S. crop receipts.

It is vital that OPP have sufficient resources to regulate the introduction and maintenance of pesticide chemicals. As required by law, pesticides are subject to rigorous scientific review before they may be authorized to be marketed. Once registered, these products are subject to additional periodic scientific review every 15 years to assure they continue to meet the safety requirements established under FIFRA. Consequently, it is imperative that OPP has the requisite skilled personnel, institutional knowledge, and adequate resources to conduct both the initial reviews as well as the required periodic reviews so that these tools continue to be available to the

agricultural community. Assuring that such resources are available not only benefits growers but also reinforces with the public that these important tools are being appropriately regulated in the public interest to protect humans and the environment.

At the end of 2024, there were approximately 550 full-time employees (FTEs) at OPP. By way of background, in 1994, before the passage of the Food Quality Protection Act (FQPA) which substantially increased the responsibilities of OPP for assuring that the registered uses of a pesticide were in accord with the rigorous new safety standard required by that law, there were approximately 770 FTEs in OPP. It is understood that with the recent changes, there are now less than 500 FTEs in OPP.

We understand that the Administration is working on a range of initiatives aimed at reducing the size and scope of the federal government, including those programs managed by the Agency. However, the functions of OPP are fundamentally different from many other aspects of EPA and are necessary to provide what is essentially a permitting program upon which the agriculture community depends. Additionally, approximately one-third of the pesticide program's budget is funded through a user fee program. Reductions at OPP would lead to significant delays in the approval of new tools, and risk access to current products that require re-approval. Loss of pesticide tools and slowdowns in accessing new tools would reduce U.S. agriculture's global competitiveness and negatively impact farmer profitability.

Over the past several years, federal courts have demonstrated their willingness to consider the cancelation of existing registered products when they believe that the Agency is not meeting its statutory requirements. The uncertainty that litigation poses is not good for our grower members in planning how to address their pest management needs. It is important that OPP's assessments are strong and rigorous to withstand judicial scrutiny. This requires a skilled and trained staff to develop them. Additionally, public confidence in EPA's ability and expertise to carry out its responsibilities for assessing and approving pesticides is essential and can only happen with an appropriately resourced OPP. Historically, the EPA, the Food and Drug Administration and the U.S. Department of Agriculture have consistently maintained – and we agree – that our Nation's food supply is among the safest in the world, due in large part to the diligent efforts of the OPP.

In view of the foregoing, we ask you to take the steps necessary to assure that OPP has the necessary number of skilled personnel and adequate funding to effectively carry out its responsibilities under FIFRA. We appreciate your consideration of this request.

Sincerely,

Almond Alliance
AmericanHort
American Farm Bureau Federation
American Pulse Association
American Seed Trade Association
American Soybean Association
California Citrus Quality Council
California Fresh Fruit Association

California Prune Board
California Specialty Crops Council
California Tomato Research Institute
Cherry Marketing Institute
Colorado Potato Administrative Committee
Cranberry Institute
Empire State Potato Growers
Florida Citrus Mutual
Florida Fruit and Vegetable Association
Friends of the IR-4
Hop Growers of America
International Fresh Produce Association
Idaho Grower Shippers Association
Idaho Potato Commission
IR-4 Project
Maine Potato Board
National Alliance of Independent Crop Consultants
National Onion Association
National Potato Council
North Carolina Potato Association
Northland Potato Growers Association
Northwest Horticultural Council
Oregon Potato Commission
Pennsylvania Cooperative Potato Growers
Potato Growers of Michigan
Society of American Florists
Texas Citrus Mutual
United Potato Growers of America
US Apple Association
USA Dry Pea & Lentil Council
USA Rice
Washington State Potato Commission
Washington Winegrowers Association
Western Growers Association
Wild Blueberry Commission of Maine
Wisconsin Potato &Vegetable Growers Association

Cc: President Donald J Trump