



AGRIBUSINESS
ASSOCIATION OF IOWA

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February 9, 2023

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Proposed Mitigation Measures for Rodenticides, Docket ID EPA-HQ-OPP-2015-0778-0093

To Whom It May Concern:

The Agribusiness Association of Iowa (AAI) exists for the purpose of advocating, communicating, and educating on behalf of a proactive, profitable, and environmentally responsible professional agribusiness industry. AAI's membership consists of approximately 200 businesses with over 1,100 locations across the state of Iowa that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment, and additional products and services that benefit agriculture.

Many of our members' locations store grain, seed, feed, and other potential food for rodents and are concerned about losses of products, disease, and damage to equipment. Ag retail members distribute and sell rodenticides to farmer customers for on farm use to protect grain, seed, and feed. We appreciate the opportunity to submit comments regarding the proposed mitigation measures for rodenticides.

Some of the proposed restrictions place on rodenticides in the Proposed Interim Decision(s) (PIDs) would significantly increase costs and make it nearly impossible for our facilities to sell and distribute rodenticides to the professional and agricultural markets.

According to the U.S. Department of Agriculture, rodents are responsible for millions of dollars in damages to field crops, stored grain, and farm equipment annually. They can spread over 60 diseases to humans, companion animals, and livestock. Removing or severely restricting rodenticides from the distribution network would result in less product in the hands of applicators and farmers who need these crucial products within their integrated pest management programs. This will result in significant crop damage and livestock loss and jeopardize the safety of the food supply, both of which could exacerbate food cost and availability. Specifically, we are concerned about the negative consequences associated with the following mitigation measures included in the PID(s):

- Restricted Use Pesticide (RUP) classification regardless of bait type is overly restrictive. Only restricted use pesticide dealers can sell RUPs. The only products available as General Use Pesticides (GUPs) will be ready-to-use prefilled disposable bait stations and gummy worms or ready-to-use gel for mole control.

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- Retailers need to comply with additional requirements for RUP products including licensing, record keeping, and checking the licensing of customers. This may require hiring additional staff and increasing personnel costs, training costs, and administration costs to meet these additional RUP regulations.
- Non refillable bait stations are expensive and ultimately lead to more non-recyclable plastic waste. Consumers generally stay away from purchasing non-recyclable, single use, plastic bait stations.
- Prefilled bait stations would more than double the cost to customers. We need to provide pest control solutions regardless of social economic status.

Many of these proposed mitigation measures would hamper our members' ability to provide responsible, affordable rodenticide products for their customers. As EPA works to finalize the interim registration decisions for rodenticides, we urge the Agency to take into account the benefits of these products and the severe impact that these mitigation measures would have on our members and their customers. Rodenticides play an important role in protecting property and health. Thank you for your review and consideration of these comments.

Sincerely,



Bill Northey
Chief Executive Officer
Agribusiness Association of Iowa