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February 13, 2023

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

Re: Endangered Species Act (ESA) Workplan Update, ID EPA-HQ-OPP-2022-0908

Dear Ms. Biscoe:

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 that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture.

Many of our members' locations employ certified pesticide applicators who apply pesticides to their customers' fields. We appreciate the opportunity to submit comments regarding the ESA workplan update because pesticides are important tools for pest resistance, soil and water conservation, wildlife habitat, farm production, and profitability.

EPA strongly encouraged Iowa's development of the [Iowa Pest Resistance Management Program](#) to protect Iowa crops from costly pest resistance. AAI plays an active role in this program, and we need multiple modes of action, efficacious rates, and flexible timing of applications available to applicators to battle the development of pest resistance. It is important for applicators to continue to have both pre- and post-emergence application options as part of their available toolkits to successfully manage pesticide resistance. A University of Missouri Extension weed scientist was quoted in an [August 25, 2022 Successful Farming article](#) saying:

- When considering herbicides to control of pigweed species like Palmer amaranth, use herbicides with multiple effective modes of action, Bradley says. The most effective programs include residual herbicides applied at full rates prior to soybean planting followed by an additional application of an "overlapping" residual herbicide later in the season.

ESA mitigation measures must provide options without the unintended consequences of pest resistance development by limiting pesticide modes of action, rates, and timing.

If applicators have fewer pesticide options, the use of tillage for pest control will increase. In Iowa, EPA has strongly encouraged our state's development and implementation of the [Iowa Nutrient Reduction Strategy](#) to reduce nutrient loss to Iowa waters and the Gulf of Mexico. We have made great progress

900 DES MOINES STREET | DES MOINES, IA | 50309-5549
515.262.8323

as a state to reduce tillage and decrease phosphorus losses compared to our 1980-1996 baseline. If pesticides become less practical, economical, or effective to use, tillage for pest control will increase, leading to increases in habitat losses, soil erosion, phosphorus losses, and greenhouse gas emissions while decreasing soil health and water quality.

Pesticides play an important role in many soil and water conservation practices. Cover crop management includes herbicides for termination of the cover crop and insecticides to control insects that find cover crops attractive but could damage the following cash crop. Reduced tillage such as no-till relies on herbicides for weed control.

Many soil and water conservation practices provide valuable habitat including wetlands, bioreactors, saturated buffers, grass waterways, prairie strips, and buffer strips. Herbicides are frequently used during the establishment period of perennial native vegetation to suppress weed competition.

The environmental benefits of pesticides must be considered when considering ESA mitigation measures. More options should be offered as mitigation measures in order to provide flexibility to deal with potential increased costs, complicated record keeping, and confusing responsibilities for implementing mitigation measures.

Conservation practices are not the responsibility of a commercial pesticide applicator who bear the liability of following the pesticide label. In Iowa, the majority of the cropland is owned by non-operator landowners. Tenant farmers rent the land, often relying on services provided by agribusinesses for crop protection and nutrient management. These are delicate relationships that are important for increasing conservation practices on the land. Proposed ESA mitigation requirements will only complicate these relationships.

Thank you for the opportunity to provide comments regarding the ESA workplan update and the EPA's efforts to protect wildlife and provide regulatory certainty for pesticide applicators. We look forward to future opportunities to engage with EPA as the ESA workplan is implemented.

Sincerely,



Bill Northey
Chief Executive Officer
Agribusiness Association of Iowa