



CALIFORNIA FARM BUREAU FEDERATION  
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Submitted electronically via: <https://oehha.ca.gov/comments>

**RE: Hazard Identification Material for Chlorpyrifos**

Dear Ms. Ramirez:

Agriculture Council of California (Ag Council), California Farm Bureau Federation (Farm Bureau), California Association of Winegrape Growers (CAWG), Almond Alliance of California (Almond Alliance) appreciate the opportunity to submit comments on the Office of Environmental Health Hazard Assessment's scientific materials that they are using to describe evidence for the developmental toxicity of chlorpyrifos to be presented for possible listing to the Developmental and Reproductive Toxicant Identification Committee on November 29.

Our organizations strive to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of commodities through responsible stewardship of California's resources. As an essential part of California's farming heritage, our members understand the importance of protecting the land, water and air for their families, their communities and future generations.

We have been involved in the federal and state regulatory processes and comment opportunities for over a decade to provide balance against what we believe is an organized effort to mischaracterize chlorpyrifos.

**Importance of Chlorpyrifos in Agriculture**

Chlorpyrifos (CPF) was first registered in the United States in 1965 and today is used on more than 800,000 acres, accounting for \$23 billion in production value for California. It is a critical part of pest management programs for farmers and contributes significantly to the control of insect pests in more than 60 crops including tree nuts, vegetables, grapes, citrus, cotton and alfalfa. CPF is one of the most widely used active ingredient in insecticides and is used on leaf-feeding and soil-dwelling insect pests. It is often the first product used to attempt control of new or unknown insect pests because of its broad-spectrum control, fast

knock down, efficacy, tank mix compatibility and management and use information.

Pest management is an important component of any agricultural production and few insecticide alternatives are available for the control of certain insect pests, especially for minor or new pests, or for use in small acreage crops. CPF is significantly less disruptive to beneficial populations than alternative chemistries and, when used as part of an Integrated Pest Management program, it has a short-term impact on natural enemy populations. In some instances, the loss of CPF would result in increased insecticide use where it gets replaced by an insecticide with a narrower spectrum of control. Additional insecticide applications may be required to control multiple pests if the alternative insecticide does not control all insect pests present, or does damage to the natural beneficial population resulting in flaring of certain insect pest populations.

The responsible and appropriate use of pesticides allows for more effective use of resources such as water, nutrients, and land by avoiding losses (food waste) both in the field and after harvest. Controlling insect populations with predictable and reliable effects is essential for California agriculture, not just to reduce the amount of product that is classified as inedible due to insect damage and mold, but for food safety reasons. Since a considerable number of California crops are exported, it is vital the state's agricultural abundance comply with quality and international food safety standards. CPF has over 1,000 accepted Maximum Residue Levels established by importing countries for crops across the globe, removing a critical obstacle for the export of California grown crops.

## **Toxicity Review**

Chlorpyrifos has been evaluated for developmental and reproductive toxicity by global regulatory bodies and authorities including USEPA the EU and others, as well as by independent scientists and review boards. These agencies, independent scientists, and review boards have consistently concluded, based on years of study with well tested methods, there haven't been any neurodevelopmental effects seen.

The EPA Office of Pesticide Programs (OPP) has concluded that there are neurodevelopmental effects based on the epidemiological studies. However, given that epidemiological studies which only show correlations, not causation, more thought needs to go into what criteria epidemiological studies need before they can be used for regulatory purposes.

While our organizations do not represent an independent toxicological opinion, the wealth of available information on this well studied chemical does not suggest a substance that has been "clearly shown" to cause developmental toxicity which we know is the criteria to be listed by the Developmental and Reproductive Toxicant Identification Committee.

California farmers are already subject to the most stringent regulatory oversight in the country. We are committed to the proper stewardship and use of pesticides to insure the protection of the public, the environment and our families. Ag Council, Farm Bureau, CAWG, and the Almond Alliance seek constructive solutions and urge that practical use conditions

be maintained for this important tool. Should you have any questions or need anything further from us, please contact either Rachael O'Brien at (916) 443-4887/ [Rachael@agcouncil.org](mailto:Rachael@agcouncil.org); Cynthia Cory at (916) 446-4647/ [ccory@cfbf.com](mailto:ccory@cfbf.com) or Michael Miller at (916) 379-8995/ [michael@cawg.org](mailto:michael@cawg.org)

Sincerely,



Emily Rooney  
President  
Agricultural Council of California



Cynthia L. Cory  
Director, Environmental Affairs  
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Michael Miller  
Director of Government Affairs  
California Association of Winegrape Growers



Kelly Covello  
President  
Almond Alliance of California

cc: Lauren Zeise, Director  
Allan Hirsch, Chief Deputy Director