Yesterday, Dec. 8th, I was at a meeting in Armstrong County when Jodie Stockett, Dow AgroSciences rep, showed me an announcement that EPA has a proposal to remove all residue tolerances for chlorpyrifos insecticide (See Dow’s announcement below). EPA has now opened a 60 day period for interested parties to comment on the tolerance removal as proposed. The actual document from EPA can be found at http://www.epa.gov/sites/production/files/2015-10/documents/chlorpyrifos_nprm_prepublicationcopy_2015-10-28.pdf.

This action by EPA is due to a recent ruling by the 9th Circuit Court of Appeals that after nine years EPA has delayed long enough to ban chlorpyrifos for agriculture use (http://legal-planet.org/2015/11/10/the-ninth-circuit-takes-epa-to-task-twice/). In the ruling August 10, 2015 the court ordered EPA to respond to allegations about chlorpyrifos in a 2007 activist petition, even before the Agency has finished its formal health and safety evaluations of the product currently

The chlorpyrifos products will still be available for use through 2016. But unless EPA concludes that the tolerances meet the safety standards or tolerance levels can meet the safety standards for specific or a group of tolerances, chlorpyrifos insecticides will no longer be available for agriculture use. This will affect insect control options for field, fruit, nut, and vegetable crops. For us on the Texas High Plains this can possibly impact the following crops; alfalfa, apple, corn, cotton, peanut, pecan, soybean, sunflower, vegetables, and wheat.

EPA propose removal of chlorpyrifos tolerances

EPA Proposal for Revocation of U.S. Tolerances for Chlorpyrifos
November 30, 2015

On October 30, 2015, U.S. EPA announced a proposal to revoke US crop tolerances for the insecticide chlorpyrifos. This proposal is an outcome of a recent U.S. Ninth Circuit Court of Appeals decision ordering EPA to respond to allegations about chlorpyrifos in a 2007 activist petition, even before the Agency has finished its formal health and safety evaluations of the product currently

http://txppipm.blogspot.com

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The Texas A&M System, U.S. Department of Agriculture and the County Commissioners Courts of Texas Cooperating.
underway in registration review. If this revocation of crop tolerances occurs, U.S. Growers will not be able to apply chlorpyrifos to their crops.

EPA said it will not act on its proposal to revoke crop tolerances until it has received and responded to input from interested stakeholders, including growers who rely on chlorpyrifos-containing products to protect their crops and livelihood from destructive insect pests. **EPA’s proposal would not affect the 2016 growing season.**

This public comment period serves as an opportunity for users and supporters of chlorpyrifos to share the economic and collective benefits in addition to express the potential agronomic impact without its availability. Additionally, public comments can better inform the U.S. EPA about how the product is used and the key importance of maintaining crop tolerances.

**Call to Action: Comment on Public Docket by January 5, 2016.** EPA needs to know how revocation of crop tolerances will impact your operation.

While any comment to the EPA should reflect your thoughts, we have provided some general guidance for your consideration on the types of comments the Agency would benefit from hearing.

Dow AgroSciences is committed to addressing the needs of its U.S. customers for continued access to chlorpyrifos. DAS remains confident that all U.S. tolerance issues can be resolved through continued scientific support and dialog with EPA.

Your support through the public comment period makes a difference. Thank you for your consideration.

**HOW TO SUBMIT A COMMENT:**

**Electronic Submission**
Select this hyperlink: Comment Now for Chlorpyrifos OR Visit: www.regulations.gov, search “Chlorpyrifos 0653”, select “Comment Now”

**Post Mail Submission**
EPA Address:
OPP Docket, Environmental Protection Agency
Mailcode 2822IT
1200 Pennsylvania Ave, NW
Washington, DC  20460
Reference Chlorpyrifos; Tolerance Revocations Docket ID No. EPA-HQ-OPP-2015-0653

**CLICK HERE for a guide on what to include in your comment.**

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