



TO: Members of the Joint Committee on Agriculture, Conservation and Forestry
Cross Building
Room 214
Augusta, ME 04333

FROM: Riley Titus
CropLife America

DATE: March 2, 2021

RE: L.D. 316, An Act To Prohibit the Use of Chlorpyrifos

Chairs Dill and O’Neil, and distinguished members of the Joint Committee on Agriculture, Conservation and Forestry,

Thank you for the opportunity to submit testimony about L.D. 316, which would prohibit the use of chlorpyrifos. **We respectfully oppose the bill and request an unfavorable vote.**

Chlorpyrifos is one of the more widely studied pesticide products in the world; having been reviewed and registered for use in approximately 80 countries. It is a valuable tool for Maine agriculture, combating a range of pest pressures to fruit and vegetable crops. It is used for controlling root worms, boring insects, vegetable maggots and aphids, and is a critical control for apples, plums, pears and cherries which may have few to no alternatives to combat the borers that threaten these crops. Eliminating this pesticide would remove an invaluable tool for farmers and could cause future threats to food security and production in Maine, and cost commodity producers, the state, and land managers substantial amounts of money in damaged investments and natural resources.

We support and promote science-based policy and regulatory processes necessary in the regulation of pesticide products at both the state and federal level. The Maine Department of Agriculture Conservation and Forestry (DACF) and Board of Pesticides Control regulates pesticides through the Maine Pesticide Control Act of 1975. DACF ensures safe and proper pesticide use in the state through the registration of pesticides, certification of pesticide applicators, and through enforcement and research activities. DACF’s regulation of pesticides also ensures consistency with federal regulation and scientific standards, particularly environmental and human health and safety standards.

Established under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), pesticides are rigorously reviewed, evaluated, and approved for sale and use by the U.S. Environmental Protection Agency (EPA) on an ongoing basis, ensuring they meet the most current safety and scientific standards. FIFRA requires the EPA to engage in a risk-benefit analysis in its regulation of pesticides. A thorough and holistic approach that relies on sound science and robust data and ensures that risk conclusions are as closely tied to real-world conditions as practicably possible.

Representing the Crop Protection Industry

4201 Wilson Boulevard, Suite 700, Arlington, VA 22203 • 202.296.1585 phone 202.463.0474 fax www.croplifeamerica.org

When considering and registering a pesticide for food crop protection, the EPA must determine exposures from the intended use pose “reasonable certainty of no harm” to people, including potentially sensitive individuals such as children and pregnant women. During this process, the EPA considers a dossier of best available scientific information and ensures the integrity and reliability of scientific testing involves a system of management controls known as Good Laboratory Practices (GLP), which ensure the research has been performed and documented properly and transparently. Under GLP, virtually every aspect of research and reporting must conform to a detailed, pre-approved checklist. While the GLP process is important for regulatory compliance, its true purpose is to make sure that sound scientific data are used to conclude the product will not have unreasonable adverse effects on people, wildlife, or the environment. In Chlorpyrifos’ case, consideration and evaluation of this weight of evidence shows that current uses meet these regulatory standards.

In September 2020, EPA released its draft risk assessment for chlorpyrifos, finding among other things, “With the limited remaining residential uses of chlorpyrifos EPA found no risks of concern, including to children’s health, when products are used according to the label instructions.¹” The draft risk assessments are an extensive evaluation of current, available data on chlorpyrifos’ health and environmental impacts. We are concerned that L.D. 316 fails to recognize the recent findings and robust pesticide regulatory process.

We encourage the Committee to rely on the expertise of DCAF, which ensures safe and proper pesticide use in the state, recognize the U.S. EPA findings, and continue to provide Maine farmers with the support and tools necessary to remain competitive and viable.

Sincerely,

Riley Titus
Director, Government Affairs
CropLife America
rtitus@croplifeamerica.org
202-872-3856

CropLife America (CLA) represents the manufacturers, formulators and distributors of crop protection products in the United States. CLA member companies produce, sell and distribute virtually all the crop protection products used by American farmers.

¹ EPA Takes Next Step in Review Process for Insecticide Chlorpyrifos, Making Draft Risk Assessments Available, September 22, 2020, <https://www.epa.gov/pesticides/epa-takes-next-step-review-process-insecticide-chlorpyrifos-making-draft-risk-assessments>