

Joel Schreurs  
2157 County Highway 8  
Tyler, MN 56178

October 29, 2021

Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: Formal Written Objections and Request to Stay Tolerance Revocations: Chlorpyrifos (EPA-HQ-OPP-2021-0523)**

To Whom It May Concern:

My name is Joel Schreurs, and I am a soybean and corn grower from Tyler, Minnesota. I am writing to object to EPA's revocation of the tolerances of chlorpyrifos. This insecticide is an important tool for my farming operations as well as for thousands of other growers across the country. Losing access to chlorpyrifos would significantly increase my costs of doing business, increase the vulnerability of my crops to pests, and reduce my ability to be a good environmental steward. I request EPA rescind its rule revoking tolerances and allow growers to continue to use this vital tool. I also ask that EPA stay implementing this rule until it can fully consider objections raised and the harms that will be caused by this action.

In my family's operation, we primarily use chlorpyrifos to control soybean aphids and two-spotted spider mites on our soybean crop. In instances when these pests reach economically damaging levels, chlorpyrifos is the most effective tool that can control both pests. Especially considering most populations of aphids in our region have developed resistance to pyrethroid chemistries, there are no other options that exist that will control for both pests – I would need at a minimum two chemistries to control for both.

If I lose access to chlorpyrifos, my operational costs and environmental impact will also likely increase. As mentioned, there is no one-to-one replacement for chlorpyrifos to control both pyrethroid-resistant aphids and two spotted spider mites. Very few replacement chemistries exist, especially for spider mite control. Dimethoate can control for spider mites and is roughly the same cost per acre as chlorpyrifos. However, it is unreliable in controlling aphids. I would need another non-pyrethroid chemistry to control aphids, such as imidacloprid, but that would cost me approximately an additional \$1.50/acre. Under a worst-case scenario, this could push my operational costs up more than \$1,000 annually and require me to apply much more pesticide active ingredient than I do with chlorpyrifos, increasing the environmental impact of my operation.

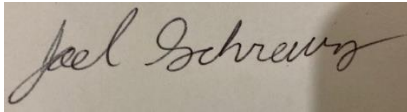
Additionally, by removing one of the already limited number of tools to control these pests, this action will increase the rate at which pest populations develop resistance to remaining chemistries. As part of integrated pest management strategies, growers rotate and mix chemistries to reduce the chances of pests developing resistance to any one active ingredient. By taking away a critical tool, EPA will reduce the effectiveness of other chemistries and increase the chances of pests developing resistance.

To lose the ability to control for these pests, through product loss or increases in pest resistance, would be economically devastating to my operation. Years ago, when soybean aphids first emerged in our region, chlorpyrifos supplies were limited based on the regional spike in product demand. Acres that went untreated showed approximately 12 bushel/acre yield reductions. At current market prices, this

would mean a loss of approximately \$150/acre. When considering that my family raises 700-800 acres of soybeans annually, losing the ability to control aphids could cost my family's operation \$120,000 per year. And this is only considering the impact of aphids – it does not factor in the impacts of spider mites or other damaging insect pests controlled by chlorpyrifos.

Growers do not want to apply pesticides if they do not have to – we would prefer to reduce our business costs and environmental impact. However, pest levels can reach damaging levels, and that is when we need effective tools, like chlorpyrifos, to protect our crops. Losing access to chlorpyrifos would both greatly harm my farming operations and others by tens to potentially hundreds of thousands of dollars annually and reduce our ability to be good environmental stewards. I object to the revocation of these tolerances, urge EPA to rescind this rule, and ask that this rule be stayed to prevent these significant, irreparable harms from coming to pass until these objections can be fully considered.

Sincerely,

A handwritten signature in cursive script, reading "Joel Schreurs", written in dark ink on a light-colored background.

Joel Schreurs