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

Submitted electronically via Federal eRulemaking Portal

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

To Whom It May Concern:

We farm in Minnesota and South Dakota, in the Red River Valley, and together present this letter in response to EPA's final rule issued on August 30, 2021, to revoke all tolerances for the insecticide chlorpyrifos (EPA-HQ-OPP-2021-0523). Pursuant to the Federal Food, Drug, and Cosmetics Act (FFDCA) section 408(g) (21 U.S.C. 346a). We are writing to file formal objections regarding this action. Based on these objections, we urge EPA to rescind the final rule revoking tolerances and consider continued agricultural uses of chlorpyrifos under its ongoing, normal-order registration review of chlorpyrifos. Furthermore, because this rule will cause significant and irreparable harm to food and agricultural stakeholders, we request the Agency stay implementation of the rule until these objections can be formally addressed and responded to by EPA.

Our family grows corn, wheat, alfalfa, sugarbeets, and soybeans. This rule damages our family farm directly by increasing our costs to grow sugarbeets and soybeans and decreasing the value of our crops.

We are members of the Minn-Dak Sugarbeet Farmers Cooperative, sweetening life in the Red River Valley since 1974. As you are aware, sugarbeets are susceptible to root maggots, which are a problem in our region. Chlorpyrifos is the most effective product available for treating emerged maggots. We have very few choices for treatment, and competing products suppress the pest – they do not control the pest – and are only registered for use on adult flies, not larvae. Without chlorpyrifos, our sugarbeet acres will be exposed to this damaging pest which can inflict up to 45 percent yield loss and \$500 in damages per acre. We annually grow 400 acres of sugarbeets on our farm, as part of the 115,000 acres of sugarbeets our cooperative grows annually – so the potential damage from root maggots is a significant concern to both our operation and our farmer-owned co-op.

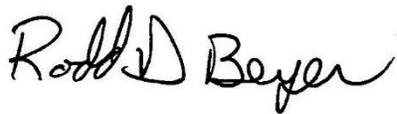
In addition to treatment to our sugarbeet crop, chlorpyrifos is an important crop protection tool for our soybeans. We use chlorpyrifos to control both two-spotted spider mites (TSM) and soybean aphid populations. We can verify from experience on our own farm that these pests have developed resistance to other insecticides, such as pyrethroids, and can inflict yield losses as high as 60 percent if left unchecked....which can result in a \$400/acre crop loss. For our farm, there is no one-to-one replacement for chlorpyrifos – it is the only option that will control both pests. We have TSM and pyrethroid-resistant aphids, and because of this rule, our family will now have to choose between applying twice as much pesticide active ingredient (increasing our farm's operational costs) or face serious crop damage (decreasing the value of our crop). This rule will have resulted in an increase in pesticides used in the environment and additional sprays - which also unnecessarily increases the use of water and fuel!

We grow a diverse crop mix, and the ban on chlorpyrifos has a diverse set of consequences. Although larger impacts have been quantified for our sugarbeet and soybean crops, our corn and alfalfa crops are also affected. We use chlorpyrifos on non-GMO corn to control corn borer. We also use chlorpyrifos on our alfalfa to control crickets and weevil. Inability to access chlorpyrifos jeopardizes our ability to continue to raise these crops.

It is difficult for us in the field to watch our government separate farmers from market-developed tools that work – only to replace them with less environmentally friendly alternatives!

We urge EPA to rescind this rule based on the above objections and to stay the rule's implementation to avoid these irreparable harms from taking effect until the Agency can thoroughly review and respond to these concerns.

Sincerely,



Rodd Beyer
US Agricultural Producer since 1997



Jamie Beyer
US Agricultural Producer since 2013