

Andrew Lance
34429 Hawk Rd.
Barnard, MO 64423

October 29, 2021

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

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

To Whom It May Concern:

My name is Andrew Lance, and I am a soybean, corn, wheat, and alfalfa grower from Barnard, Missouri. I also run a cattle beef operation. 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, greatly increase the vulnerability of my crops to pests, and reduce my ability to produce sustainably and steward the environment. I request EPA rescind its rule revoking tolerances and allow growers to continue to use this important tool.

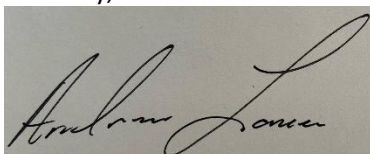
Chlorpyrifos is an important insect management tool for me and other growers. For soybeans, it is the only product effective against both aphids and spider mites. In corn, it is the only product effective at controlling Japanese beetles. For alfalfa, I use it to control potato leaf hoppers and fall armyworms. The past growing season in our area has seen increased and heavy pressures from army worms from July through September. If it wasn't for chlorpyrifos, we wouldn't have been able to protect our critical crops from the fall armyworms. If left uncontrolled, all of these insect pests will inflict double-digit yield losses and cause tens of thousands of dollars in crop damages.

As mentioned, many of these pests are not effectively controlled by other products currently on the market, which means growers may need two or more products to manage an insect pest currently controlled by chlorpyrifos. Not only will this increase my business costs and that of other growers by hundreds to tens of thousands of dollars annually in additional product purchases, but it means I will have to use a greater volume of pesticides to control insect pests. It will also likely increase the number of tractor passes I and others must make to apply chemicals, increasing fuel and water use, and reducing our ability to steward the environment and our natural resources. For other pests I regularly face, there are no effective replacements for chlorpyrifos, which means my crops will be susceptible to significant damage if we lose access to this important chemistry.

Additionally, by losing access to chlorpyrifos, the remaining insect management tools growers have will increasingly have reduced effectiveness. Insects and other pest populations over time develop resistance to tools growers have to control them. To prevent the development of resistance, growers rotate or mix chemistries that control pests through different biochemical modes of action. However, by taking away an important tool, it gives growers fewer unique tools to control insects, meaning pests will more quickly develop resistance to remaining tools and expose growers to economic damage.

To lose access to chlorpyrifos would greatly harm my farming operations and those of others by thousands to tens of thousands of dollars annually and reduce our ability to be good environmental stewards. I object to the revocation of these tolerances and urge EPA to rescind this rule.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read "Andrew Lance".

Andrew Lance