

THE MICHIGAN VEGETABLE COUNCIL, INC.

6835 S Krepps Rd • St Johns, MI 48879 • 517-663-6725

Co-Sponsor of the

GREAT LAKES FRUIT, VEGETABLE AND FARM MARKET EXPO

Grand Rapids, Michigan

December 7-9, 2021 • December 6-8, 2022

Board of Directors

October 19, 2021

President

KATIE (SWANSON) HENSLEY

Ravenna, MI

To: Environmental Protection Agency (EPA)

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

Vice President - Sec - Treas

MATT McCALLUM

Sparta, MI

Asst. Secretary-Treasurer

MICHAEL KENNY

Merrill, MI

The Michigan Vegetable Council, INC. (MVC) is a non-profit organization supporting Michigan's vegetable industry.

JOHN BAKKER

Hart, MI

Pursuant to the Federal Food, Drug, and Cosmetics Act (FFDCA) section 408(g) (21 U.S.C. 346a), the Michigan Vegetable Council is writing this concerning EPA's final rule issued on August 30, 2021, to revoke all tolerances for the insecticide Chlorpyrifos (EPA-HQ-OPP-2021-0523). The Michigan Vegetable Council is writing to file formal objections regarding this action. The Michigan Vegetable Council objects based on 3 aspects. First, the EPA has established sound science for allowing tolerances of Chlorpyrifos. Second, the final rule left out any plans for the ramifications of removing tolerances on Chlorpyrifos. Third, Michigan is a leader in crops which will no longer be grown without the use of Chlorpyrifos.

GREG BIRD

Mason, MI

KEITH BOUWKAMP

Grant, MI

MATT DEBLOUW

Capac, MI

CHRIS FALAK

Fremont, MI

MIKE IOTT

Petersburg, MI

The EPA concluded 11 high-benefit agricultural uses of Chlorpyrifos that "the agency has determined will not pose potential risks." Asparagus is a major specialty crop in Michigan. Asparagus was included as one of these 11. The EPA is the scientific government agency which is expected to manage the pesticides allowed within the United States of America. The Michigan Vegetable Council supports the science based rules of the EPA and is frustrated that the Ninth Circuit Court feels they have the knowledge to overrule the EPA on matters such as this.

STEPHANIE (ANDERSEN) KIPP

Blanchard, MI

BEN KUDWA

Grand Ledge, MI

HAILEE LEITZ

Sodus, MI

JUSTIN OOMEN

Hart, MI

The EPA revoked tolerances on Chlorpyrifos, set to be effective on February 28, 2022. Chlorpyrifos exists today and will still exist on February 28. The Michigan Vegetable Council believes that tolerances should be allowed on Chlorpyrifos until the EPA can make a clear ruling on what Chlorpyrifos residues are allowed on existing crops and how to deal with these residues. Crops are currently being put in cold storage, processed, etc, where Chlorpyrifos residues could exist far past February 28, 2022. The majority of the Chlorpyrifos use in Michigan occurs March-June. This application period means that farmers and companies have inventory of Chlorpyrifos on-hand. The EPA should allow tolerances until a plan is in place to dispose of a product which no longer has a use.

KRISTIN OOMEN

Scottville, MI

ERIK THIES

Dowagiac, MI

ADAM VAN DYK

Imlay City, MI

ROGER VICTORY

Hudsonville, MI

Executive Director

GREG BIRD

Mason, MI

THE MICHIGAN VEGETABLE COUNCIL, INC.

6835 S Krepps Rd • St Johns, MI 48879 • 517-663-6725

Co-Sponsor of the

GREAT LAKES FRUIT, VEGETABLE AND FARM MARKET EXPO

Grand Rapids, Michigan

December 7-9, 2021 • December 6-8, 2022

Board of Directors

President

KATIE (SWANSON) HENSLEY

Ravenna, MI

Vice President - Sec - Treas

MATT McCALLUM

Sparta, MI

Asst. Secretary-Treasurer

MICHAEL KENNY

Merrill, MI

JOHN BAKKER

Hart, MI

GREG BIRD

Mason, MI

KEITH BOUWKAMP

Grant, MI

MATT DEBLOUW

Capac, MI

CHRIS FALAK

Fremont, MI

MIKE IOTT

Petersburg, MI

STEPHANIE (ANDERSEN) KIPP

Blanchard, MI

BEN KUDWA

Grand Ledge, MI

HAILEE LEITZ

Sodus, MI

JUSTIN OOMEN

Hart, MI

KRISTIN OOMEN

Scottville, MI

ERIK THIES

Dowagiac, MI

ADAM VAN DYK

Imlay City, MI

ROGER VICTORY

Hudsonville, MI

Executive Director

GREG BIRD

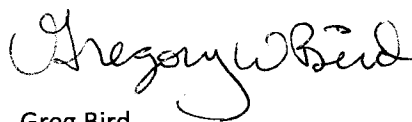
Mason, MI

Unlike row crops, many specialty crops are grown on a much smaller scale throughout the United States. However, these specialty crops often are a basis for our nation's healthy diet. Michigan is the leading state for growing turnips. Michigan State University has spent years looking for an alternative product to be used to prevent the infestation of turnips, radishes, and rutabagas by the cabbage maggot. To date no alternative has been found. Farmers who grow these vegetables will no longer be able to grow them. As well, Michigan is a leading grower of onions. An onion seed coating is used to prevent onion maggots from destroying planted onions. Some onion growers grow onions from sets in order to get onions to markets prior to shipments of imports. As with turnips, onions grown from onion sets require Chlorpyrifos for a healthy crop.

The Michigan Vegetable Council has heard from its members and they believe that imported vegetables from foreign countries will replace these crops that can no longer be grown in Michigan without a tolerance for Chlorpyrifos. The vegetables grown elsewhere will still be grown using Chlorpyrifos and it is believed that no governance of Chlorpyrifos residue will be enforced.

The Michigan Vegetable Council objects to (EPA-HQ-OPP-2021-0523). The science shows that there are safe uses of Chlorpyrifos and the Michigan Vegetable Council expects the EPA to uphold their science as the designated governing agency.

Sincerely,



Greg Bird

Executive Director

Michigan Vegetable Council

6835 S Krepps Rd

St John's, MI 48879

517-663-6725

gbird@michiganvegetablecouncil.org