Mr. Steven Bradbury  
Director, Office of Pesticide Programs  
US Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

Dear Mr. Bradbury,

The Plant-Insect Ecosystems Section (P-IE) of the Entomological Society of America is the largest Section of the ESA with 2,500 members engaged in research, teaching, and extension. We provide the following comments in response to a recent draft policy regarding a proposed Public Interest Determination that would redefine the scope of IR-4 Minor Crops Project (IR-4) and adversely affect our membership and U.S. agriculture. Specifically, the P-IE recommends that the US EPA withdraw its proposed Determination and maintain the existing process for IR-4 Minor Crops Project. The IR-4 Project has successfully brought new and improved pest management technologies for specialty crop growers in the U.S. for almost 50 years. Any changes in the Public Interest Determination are unnecessary, would increase inefficiencies, and have adverse consequences to our nation’s agriculture.

Under the Pesticide Registration Improvement Reauthorization Act (PRIA2), IR-4 tolerance petition submissions are exempt from registration fees as long as the EPA Administrator determines the exemption is in the public interest. Recently, the EPA Administrator drafted new language to redefine the criteria and the process by which IR-4 applications are determined to be in the public interest. Entomologists who work closely with specialty crop stakeholders are concerned about this newly proposed public interest determination and its potential impacts.

IR-4 already has a transparent public process for prioritizing grower needs. Entomologists working for grower and commodity groups, USDA, and numerous universities are engaged in those efforts and contribute to the public prioritization process. This public process by well-informed subject matter experts is a critical evaluation that matches pest management needs of specialty growers with the latest pest management technologies and ensures those projects agreed upon by consensus will be in the public interest. Changes to the process from US EPA are unnecessary and would interfere with an already well established, successful process.
The requirement that IR-4 submissions be composed entirely of IR-4 data also undermines the success and efficiency of IR-4 Minor Crops Project and would be detrimental to US agriculture. This strict limitation would result in inefficient use of resources. Many entomologists provide valuable assistance to IR-4 projects in prioritizing projects, developing protocols, evaluating efficacy and crop safety, and at times sharing resources as needed. IR-4 has always been a model of stakeholder cooperation that results in very efficient work processes and expedites the availability of the latest technologies for specialty crop growers. Expediting the availability of the latest technologies often-times means providing lower risk alternatives to older chemistries. This would not be possible without the cooperation of IR-4 and entomologists working in academia, extension, agriculture, and private industry.

Finally, the draft Determination very narrowly restricts the scope of IR-4 to FIFRA defined crops of 300,000 acres or less. This is contrary to the intent of Congress who recently reauthorized IR-4 and defined its mission as “specialty crops”. Defining Minor Crops on a strict per acreage basis does not account for minor uses on major crops that are just as important to US agriculture. Invasive pests such as spotted wing drosophila, light brown apple moth, or marmorated stink bugs do not distinguish between crops grown on more than versus less than 300,000 acres. Yet, the actual acreage affecting a particular crop may well be less than 300,000 acres, thus fitting within the intent and scope of the IR-4 Project.

We respectfully urge the Administrator to withdraw the proposed Determination and maintain the existing process for IR-4 Minor Crops. Public stakeholders and subject matter experts, not US EPA, are best qualified to determine what is in the best public interest.

Sincerely yours,

B. Rogers Leonard
President, Plant-Insect Ecosystems Section, Entomological Society of America
Professor of Entomology and
Jack Hamilton Regents Chair in Cotton Production
LSU AgCenter
Northeast Region/Dept. of Entomology
212 Macon Ridge Rd
Winnsboro, LA 71295