

February 15, 2010

US Environmental Protection Agency
Regulatory Public Docket (Mail Code 7502P)
Docket EPA-HQ-OPP-2009-0628
Office of Pesticide Programs
1200 Pennsylvania Ave. NW
Washington DC 20460-0001

RE: Draft Guidance for Pesticide Registrants on Pesticide
Drift Labeling (EPA-HQ-OPP-2009-0628)

I appreciate the opportunity to comment regarding the draft guidance for pesticide drift labeling. My comments will draw from my experience as a member of the Pesticide Program Dialogue Committee (PPDC) Spray Drift Workgroup and now as the Executive Director of the Missouri Agribusiness Association (MO-AG).

The PPDC Spray Drift Workgroup was sponsored by the EPA Office of Pesticide Programs (OPP) and the EPA Office of Water (OW) and worked under the auspices of the PPDC during 2006 and 2007. The members of the Workgroup included a wide variety of stakeholders.

The workgroup recommended that EPA support Drift Reduction Technology (DRT) and that EPA explore establishing performance standards for pesticide application equipment and practices designed to minimize drift. The workgroup regarded advances in DRT as being a promising way to reduce spray drift over the long run and recommended that EPA continue to support DRT.

The Workgroup also recommended that EPA work with States to explore mechanisms that tailor regulatory restrictions to local conditions. The workgroup concluded that training and education programs and programs to communicate with the affected community are a critical complement to regulatory requirements. The Workgroup recommended that EPA continue to facilitate discussions between USDA, states, user groups, and the pesticide industry to develop a comprehensive strategy for securing adequate funding for education and training programs.

I feel the Workgroup recommendations remain valid today. I would encourage EPA to remain focused on these recommendations in order to help bring about the best technology available in drift reduction and to help States and local communities determine the very best approach to protecting local communities.

Advocates for the Business of Agriculture

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Children and the environment will best be protected through a Federal Insecticide Fungicide and Rodenticide Act (FIFRA) approved and enforced label that incorporates directions for use that are based upon application techniques designed to minimize drift. I would encourage EPA to not address the “harm” determination issue by interjecting a vague standard such as “could cause harm” into EPA’s guidance. By doing so, It will also put our Missouri Department of Agriculture in a very unenviable position of trying to administer a very broad and vague standard. Also, the focus will shift away from drift reduction techniques and shift towards lawsuits. Basically, anyone could argue that any pesticide application resulted in drift that ‘could cause harm’. The legal battles will ensue and, again, the focus is taken away from solutions, such as the ones recommend above by the workgroup.

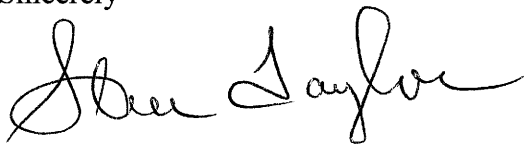
The Missouri Agribusiness Association (MO-AG) is a trade association representing a wide range of agribusiness interests. Our members include retailers who market pesticides and provide pesticide application services to the agricultural community. MO-AG members are professionals who strive to utilize the very best technology and techniques to insure the maximum protection of the agricultural crop while also protecting the environment.

In our world today, food production relies on pesticides. According to the United Nations, nearly 1/3 of the world’s food production is lost because of weeds and pests. The hope that organic agriculture will produce adequate food without the use of pesticides is shown not to be based in reality.

We would encourage EPA to continue with the science-based approach regarding pesticide label language, to maintain FIFRA’s risk-based standard of “no unreasonable adverse effects”, and to remove the vague language of “could cause” or “may cause” adverse effects or “harm” from the draft guidance.

Thank you for the opportunity to comment.

Sincerely

A handwritten signature in black ink that reads "Steve Taylor". The signature is written in a cursive, flowing style.

Steve Taylor
Executive Director

cc Missouri Congressional Delegation
Missouri Department of Agriculture