



Illinois Fertilizer & Chemical Association

14171 Carole Drive, Bloomington, IL 61705 • PH: (309) 827-2774 • Fax: (309) 827-2779 • www.ifca.com

February 13, 2023

Environmental Protection Agency
Attn: EPA Administrator Michael S. Regan
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

SUBJECT: *Regulations.gov Document - EPA-HQ-OPP-2015-0778-0093*

Dear Administrator Regan,

The Illinois Fertilizer and Chemical Association (IFCA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) proposed mitigation measures for rodenticides. IFCA's membership consists of owners, managers and employees of agrichemical retail facilities located in Illinois, as well as representatives of pesticide, fertilizer, seed and equipment manufacturers, distributors, and transporters. The majority of IFCA's business members are responsible for providing the products and services needed by Illinois farmers. IFCA is committed to developing and supporting programs that enhance the safe and efficient handling and use of agricultural inputs.

Thank you for the opportunity to comment on the importance of effective pest management to our rodenticide distribution operation. Some of the proposed restrictions placed on rodenticides in the Proposed Interim Decision(s) (PIDs) would significantly increase costs and make it nearly impossible for our facilities to sell and distribute rodenticides to the professional and agricultural markets.

According to the U.S. Department of Agriculture, rodents are responsible for millions of dollars in damages to field crops, stored grain and farm equipment annually. They can also spread over 60 diseases to humans, companion animals, and livestock. Removing or severely restricting rodenticides from the distribution network, would result in less product in the hands of applicators and farmers who need these crucial products within their integrated pest management programs. This will result in significant crop damage and livestock loss and

Representing the Agricultural Input Industry

jeopardize the safety of the food supply, both of which could exacerbate food cost and availability. Specifically, I am concerned about the negative consequences associated with the following mitigation measures included in the PID(s):

- Restricted Use Pesticide (RUP) classification regardless of bait type. Only restricted use pesticide dealers can sell RUPs. The only products available as General Use Pesticides (GUPs) will be ready-to-use prefilled disposable bait stations and gummy worms or ready-to-use gel for mole control.
- As an association that represent ag retailers, we need to comply with additional requirements for RUP products including licensing, record keeping, and checking the licensing of customers. This may require hiring additional staff and increasing personnel costs, training costs, and administration costs to meet these additional RUP regulations.
- Non refillable bait stations are expensive and ultimately lead to more non-recyclable plastic waste. We strive to provide our customers with cost effective sustainable pest control solutions. In our experience consumers generally stay away from purchasing non-recyclable, single use, plastic bait stations. We share our customers' commitment to sustainable products.
- Prefilled bait stations would more than double the cost to my customers. We strive to provide pest control solutions regardless of social economic status.

Many of these proposed mitigation measures would hamper my company's ability to provide responsible, affordable rodenticide products for our customers. As EPA works to finalize the interim registration decisions for rodenticides, I urge the Agency to take into account the benefits of these products and the severe impact that these mitigation measures would have on my business and customers. Rodenticides play an important role in protecting property and health. Thank you for your review and consideration of these comments!

IFCA appreciates EPA's time and consideration on this very important topic to Illinois ag retailers and farmers.

Sincerely,



Kevin "KJ" Johnson

President

Illinois Fertilizer and Chemical Association