

Minor Crop Farmer Alliance

Via Electronic Docket Submission <http://www.regulations.gov> August 17, 2020

Tamue Gibson, DFO,
Office of Science Coordination and Policy (7201M),
Environmental Protection Agency
1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Re: Comments Regarding Nominations to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP) to consider and review the use of new approach methodologies (NAMs) to derive extrapolation factors and evaluate developmental neurotoxicity for human health risk assessment. Docket Identification No. EPA-HQ-OPP-2020-0263

Dear Ms. Gibson:

The following comments are submitted on behalf of the Minor Crop Farmer Alliance (“MCFA”) and its members in response to the subject request for comments published by the US Environmental Protection Agency (“EPA” or “Agency”) in the Federal Register on June 17, 2020 (85 FR 36580).

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers and processors of various agricultural commodities, including food, fiber, turf grass, nursery and landscape crops, and organizations involved with public health pesticides. MCFA’s members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators, workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans. While our commodities are often called “minor

crops” or “specialty crops,” they contribute to the diverse and highly nutritious diets available for the global population, and to safe and aesthetic surroundings for our homes, schools, and places of business. These U.S. farmers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery and turf grass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than \$60 billion, or approximately 40%, of total U.S. crop receipts.

The MCFA strongly supports the Agency selecting *ad hoc* reviewers to assist the FIFRA Science Advisory Council (SAP) in evaluating the use of new approach methodologies (NAMs) to derive extrapolation factors and evaluate developmental neurotoxicity for human health risk assessment. Specifically, as noted in the Federal Register notice, “the Agency is seeking advice and recommendation from the FIFRA SAP on scientific issues associated with the evaluation and utility of NAMs as part of a weight of evidence evaluation of developmental neurotoxicity potential and the use of *in vitro* acetylcholinesterase inhibition data to develop interspecies and/or intraspecies data-derived extrapolation factors for organophosphate pesticides.” If such NAMs are reliable, they can serve to replace assumptions currently being used by the Agency.

MCFA applauds the Agency’s attempts to explore how NAMs can help better inform the Agency in evaluating the safety of pesticides. The evaluation of these NAMs need to be thorough and scientifically rigorous. Consequently, the expert *ad hoc* reviewers selected must have the requisite scientific training, background and experience so that the SAP comments at the conclusion of the process are meaningful and can serve the purpose of critically informing the Agency on these important issues. To that end, we are particularly heartened to learn that Dr. Penelope Fenner-Crisp and Dr. Marion F. Ehrlich, have been nominated to serve as *ad hoc* reviewers for the SAP. We strongly endorse their selection.

Any objective evaluation of Dr. Fenner-Crisp’s nomination will certainly readily conclude that her background, training and experience, particularly her substantial years of service with the EPA, make her eminently qualified to serve on the SAP. She is very capable and familiar with the developmental neurotoxicity and EPA’s risk assessment process. Her reputation for

scientific integrity is well established. In short, Dr. Fenner-Crisp is ideally suited to serve as an *ad hoc* reviewer on this SAP.

Similarly, Dr. Ehrich is eminently qualified to serve as an *ad hoc* for the upcoming SAP. Her curriculum vitae that was submitted to the Agency identifies her substantial experience particularly in the areas of toxicology, including modeling, and neurotoxicology, especially the neurotoxicity of organophosphorus components. Her scientific background and experience would be a substantial asset for the SAP in its review. Dr. Ehrich's participation would help maximize the opportunity to critically evaluate the utility and reliability of NAMs.

MCFA wants the most highly knowledgeable, experienced and ethical scientists to assist in the evaluation of NAMs. We strongly believe both Dr. Fenner-Crisp and Dr. Ehrich certainly meet those standards and should be selected as *ad hoc* reviewers for the SAP. Thank you for considering these comments.

Regards,

A handwritten signature in black ink, reading "Michael Aerts", enclosed in a thin black rectangular border.

Michael Aerts, Co-Chair of the Technical Committee