December 2023 Year-End Update <u>Minor Crop Farmer Alliance</u> Year-End Update

EPA ESA shift puts agency on track to impact production costs – and consumers

Minor Crop Farmer Alliance is sounding alarms about new Environmental Protection Agency plans to implement its Endangered Species Act requirements which are putting the agency on a path to increase specialty-crop production costs and consumer prices – and to lower consumption.

In June EPA <u>requested public comment</u> on a proposed <u>pilot project</u> to protect 27 vulnerable species from spray drift and runoff. The pilot would require growers to employ at least four mitigations, *plus* an additional 2,600-foot buffer. The pilot uses an overly conservative, precautionary approach, rather than taking time to conduct the refined risk assessments federal regulations call for. The proposed restrictions are not based on the best science and data.

MCFA detailed our concerns about the pilot project in <u>extensive comments</u>. And to alert the specialty crop industry, MCFA Chair Jim Cranney of California Citrus Quality Council penned an <u>opinion editorial</u> in *The Packer*.

"For many specialty crop growers, the mitigations will add significant production costs – and even take productive land out of production," wrote Cranney. "All of these measures will increase the costs of production for specialty crop farmers – and eventually take its toll on already inflation-weary consumers, who will find it more difficult to afford fresh fruits and vegetables."

MCFA first alerted industry to our concerns about EPA's ESA plans in a February <u>opinion editorial</u> in *The Packer*. For more details, <u>see</u> recent MCFA Member Minutes and comments.

In October, MCFA called out EPA for seeking to move the burden onto the specialty crop industry for the agency's historic failure to implement its Endangered Species Act requirements. <u>Commenting</u> on EPA's proposed Herbicide Strategy Framework, MCFA wrote, "The situation the agency finds itself in was not caused by the ag community. Nevertheless, the agency's proposed solution ... appears to be substantially directed outwardly towards the pesticide user community." END

Gabriele Ludwig named MCFA vice-chair

Almond Board of California's Gabriele Ludwig has been named MCFA co-chair. She replaces David Epstein, who retired from Northwest Horticultural Council this summer. Ludwig most recently served as co-chair of MCFA's Technical Committee, with Mike Aerts of Florida Fruit & Vegetable Association.

View our entire officer slate on <u>MCFA's web page</u>.

If you use antimicrobials or fungicides, read this

In December, MCFA urged EPA to proceed with caution as the agency <u>reconsiders</u> how it assesses whether antibacterial and antifungal pesticide use might trigger resistance to medically-important human drugs.

"There are extensive field data and other information demonstrating that horticultural uses of antibiotic pesticides do not present a legitimate scientific pathway for resistance to antibiotics to develop in humans or animals," <u>MCFA</u> <u>wrote EPA</u>. Meanwhile, MCFA urged the agency to commission field data regarding fungicides, reporting "MCFA is simply not aware of any [such] data."

MCFA noted composting appears to present the only opportunity to impact resistance, and suggested that restricting composting may be warranted. END

MCFA needs you, now!

- Pay your dues today. Download our invoice here.
- Better yet, increase your contribution. And suggest new members to MCFA's leadership.
- Share this update. Show your members and colleagues that MCFA's work is an important, vital investment. END

About Minor Crop Farmer Alliance

MCFA advocates for use of sound science in government minor-use pesticide policies, so that growers have access to safe, effective, affordable crop protection tools. Founded in 1991, we are funded and led by fruit, vegetable, nut, ornamental plant and other specialty crop producer organizations from across the United States. To learn more, visit us <u>online</u>.

Technical Committee to meet Feb. 22

Make plans now to attend the MCFA Technical Committee's next meeting, on Feb. 22 in Washington, D.C.

For meeting notices, bookmark <u>MCFA's web page</u>.