

MCFA

Minor Crop Farmer Alliance

January 9, 2015

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC)

Mail Code: 28221T

1200 Pennsylvania Avenue, NW

Washington, DC 20460-0001

Ms. Barbara Madden

Registration Division

Mail Code: 7505P

Office of Pesticide Programs

Environmental Protection Agency

Re: Docket Identification Number: EPA-HQ-OPP-2006-0766. “Tolerance Crop Grouping Program IV” (79 Federal Register No. 220/ Friday, November 14, 2014).

Dear Barbara Madden:

These comments are submitted by the Minor Crop Farmer Alliance (“MCFA”) on the subject notice published in the Federal Register on November 14, 2014, 79 Federal Register No. 220/Friday, November 14, 2014, pp 68153-68172 (the “Notice”).

Founded in 1991, the 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. Our members are extremely interested in the development, registration, and safe use of pest management tools including crop protection chemicals. While our commodities are often called “minor crops” or “specialty crops,” they are vitally important components in our diets. They also contribute to safe and pleasant surroundings for our homes, schools, and places of business. U.S. farmers grow—in addition to the major commodity crops, such as corn, wheat, and cotton—more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery, and turf grass crops. Specialty crop production accounts for more than \$60 billion, or approximately 40% of total U.S. crop receipts.

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We support the Environmental Protection Agency's proposed rule. The MCFA values federal regulatory efforts—such as these proposed crop grouping changes—that are reasonable and will serve to promote efficiency. We think that these changes will save time and effort for those entities seeking new pesticide tolerances, without any lowering of public health protections. This should serve to ultimately lower economic costs to a number of minor crop producers while consumers are likely to benefit from an increased variety of affordable and interesting products in the marketplace.

We applaud EPA in working with USDA's IR-4 program and with regulatory agencies in Canada and Mexico on this effort. We strongly believe that international cooperation and coordination in the setting of MRLs is a very worthwhile process and one that should be encouraged, as here is being done for crop groupings under the banner of NAFTA (the North American Free Trade Agreement). Harmonization of tolerances and MRL recommendations is acutely needed as our country's agricultural products move ever more strongly into international marketing channels. We urge EPA to continue on this path.

We are not in a position to provide specific comment on the inclusion or exclusion of the myriad of unusual agricultural commodities that are listed in this proposed rule. (We do note that many add new and expanded meaning to the term "minor crops.")

Again, we support the principles that are embedded in the proposed rule.

Sincerely yours,



Christian Schlect
Chairman
Minor Crop Farmer Alliance