



NATIONAL POTATO COUNCIL
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Via Electronic Docket Submission <http://www.regulations.gov>

September 25, 2022

Mary E. Reaves, Ph.D.
Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Comments of the National Potato Council on the Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses, Docket ID Number EPA-HQ-OPP-2022-0490

Dear Dr. Reaves,

The National Potato Council (NPC) and the undersigned state potato organizations appreciate the opportunity to submit these comments on the “Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses” (referred to herein as the “Earthjustice petition”), published in the Federal Register on July 12, 2022 (87 Fed. Reg. 41,310-12).

NPC grower members are responsible for the production of more than 95 percent of the potatoes grown in the United States. The value of that production is more than \$4.1 billion dollars at farm gate and is increased dramatically because of distribution and further processing.

The Earthjustice petition should be denied. It is a blatant attempt to short-circuit the administrative regulatory review process that Congress and the Agency have established to assess pesticide chemicals.

We are supportive of and incorporate by reference the comments submitted by the Minor Crop Farmer Alliance as part of our rationale for denial of the petition.

Potato production in the United States relies on the use of dimethoate, ethoprop, malathion, phorate and phosmet as a part of an integrated pest management (IPM) system for the control of a host of damaging pests and preventing insect borne pathogens.

There are a wide variety of factors that influence pest management decisions in potato production from crop rotation, threshold of the pest of concern, geographic region, intended use of crop, cost and availability of products, and minimizing the potential for increased pest resistance.

The following is an overview of the use of the active ingredients identified in the petition impacting potato production. While several alternative products may be listed, they are not necessarily always an alternative. In all cases, pest resistance is always a major concern in making management decisions.

Dimethoate is highly important in the control of aphids, leaf hoppers and flea beetles. It is used infrequently for chinch bugs and tarnished plant bugs when pest populations exceed established thresholds. Primarily used as the second option in IPM plan rotation to help avoid potential pest resistance. Alternative products in a managed rotation may include beta-cyfluthrin, acetamiprid, lambda-cyhalothrin, thiamethoxam, oxamyl, floicamid, pymetrozine, sulfoxaflor, flupyradifurone, spirotetramat, and methomyl and bifenthrin. In some potato production systems, it is the only product used to control leaf hoppers.

Ethoprop is highly important in the control of wireworms and is also occasionally used for nematode control. Bifenthrin, thiamethoxam, imidacloprid, oxamyl, fipronil, and chloropicrin may be alternative products in a managed rotation to help with pest resistance issues. Bifenthrin is less effect and sometimes fails to control the pest, resulting in need for use of ethoprop. It is also important as an alternative to imidacloprid, clothianidin, thiamethoxam to control against white grub species (*Phyllophaga* spp).

Malathion is important in the control of chinch bug, tarnished plant bug, and other sap feeding insects as an alternative product for sulfoxaflor. A IPM rotation program may include Beta-cyfluthrin, acetamiprid, lambda-cyhalothrin, thiamethoxam, sulfoxaflor and bifenthrin in controlling aphids and leafhoppers.

Phorate is important to our growers in controlling aphids, flea beetles and leafhoppers. Alternative products include Beta-cyfluthrin, acetamiprid, lambda-cyhalothrin, thiamethoxam, and bifenthrin.

Phosmet is very important in the control of Colorado Potato Beetle (CBP), tubermoth, aphids, flea beetles and leafhoppers. For CBP it is often used as an early season foliar application, primarily targeting colonizing adults.

The National Potato Council sincerely appreciates EPA's consideration of these comments on the Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses. Our growers look forward to the denial of the petition.

Sincerely,



Michael R. Wenkel
Chief Operating Officer
National Potato Council

Idaho Potato Commission
Maine Potato Board
Minnesota Area II Potato Council

North Carolina Potato Association
Northern Plains Potato Growers Association
Oregon Potato Commission
Pennsylvania Co-Operative Potato Growers
Potato Growers of Michigan, Inc.
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association