



To: Members of the House Environment and Transportation Committee

House Office Building
Room 250
Annapolis, MD 21401

From: Riley Titus, CropLife America

Date: February 12, 2020

RE: *HB 229; An Act Concerning Pesticides – Use of Chlorpyrifos – Prohibition*

Chair Barve, Vice-Chair Stein, and distinguished members of the House Environment and Transportation Committee:

Thank you for the opportunity to submit written testimony about HB 229, which would prohibit the use of Chlorpyrifos in Maryland. **We respectfully oppose this legislation and request an unfavorable vote.**

CropLife America (CLA) represents the manufacturers, formulators and distributors of crop protection products in the United States. CLA member companies produce, sell and distribute virtually all the crop protection products used by American farmers.

Chlorpyrifos is one of the more widely studied pesticide products in the world; having been reviewed and registered for use in approximately 80 countries. It is a valuable tool for Maryland agriculture, combating a range of pest pressures to fruit and vegetable crops. It is used for controlling root worms, boring insects, vegetable maggots and aphids, and is a critical control for apples, plums, pears and cherries which may have few to no alternatives to combat the borers that threaten these crops. **Eliminating this pesticide would remove an invaluable tool for farmers and could cause future threats to food security and production in Maryland, and cost commodity producers, the state, and land managers substantial amounts of money in damaged investments and natural resources.**

We support and promote science-based policy and regulatory processes necessary in the regulation of pesticide products at both the state and federal level. The Maryland Department of Agriculture (MDA) regulates pesticides through the Maryland Pesticide Use Control Statute (15.05.01.00), under the authority of the MDA, Pesticide Regulation Section. **MDA ensures safe and proper pesticide use in the state through the registration of pesticides, certification of pesticide applicators, and through enforcement and research activities.** MDA's regulation of pesticides also ensures consistency with federal regulation and scientific standards, particularly environmental and human health and safety standards.

Established under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), pesticides are rigorously reviewed, evaluated and approved for sale and use by the EPA on an ongoing basis, ensuring they meet the most current safety and scientific standards. FIFRA requires the EPA to

Representing the Crop Protection Industry

engage in a risk-benefit analysis in its regulation of pesticides. A thorough and holistic approach that relies on sound science and robust data and ensures that risk conclusions are as closely tied to real-world conditions as practicably possible.

When considering and registering a pesticide for food crop protection, the EPA must determine exposures from the intended use pose “reasonable certainty of no harm” to people, including potentially sensitive individuals such as children and pregnant women. During this process, the EPA considers a dossier of best available scientific information and ensures the integrity and reliability of scientific testing involves a system of management controls known as Good Laboratory Practices (GLP), which ensure the research has been performed and documented properly and transparently. Under GLP, virtually every aspect of research and reporting must conform to a detailed, pre-approved checklist. While the GLP process is important for regulatory compliance, its true purpose is to make sure that sound scientific data are used to conclude the product will not have unreasonable adverse effects on people, wildlife, or the environment. **In Chlorpyrifos’ case, consideration and evaluation of this weight of evidence shows that current uses meet these regulatory standards.**

Chlorpyrifos is currently undergoing a scientific review by the EPA, which is expected to finalize their determinations summer 2020. As part of that ongoing registration review, EPA is assessing human health risk assessments and ecological risks. **We are concerned that HB 229 fails to recognize the robust pesticide regulatory process, and human and environmental health and safety standards that exist.**

We encourage the Committee to rely on the expertise of MDA, which ensures safe and proper pesticide use in the state, allow the U.S. EPA to complete its registration review of chlorpyrifos, and continue to provide Maryland farmers with the support and tools necessary to remain competitive and viable rather than move forward with this legislation.

Sincerely,

Riley Titus
Director, Government Affairs
CropLife America
rtitus@croplifeamerica.org
202-872-3856