



Certified Crop Adviser Program

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March 9, 2022

Carolyn Schroeder
Pesticide Re-Evaluation Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Certification of Pesticide Applicators – Further Extension to Expiration Date of Certification Plans
Docket Number: EPA-HQ-OPP-2021-0831, FRL-9134.1-01-OCSP
Federal Register Publication Date: 02/07/2022

Dear Ms. Schroeder:

Thank you for the opportunity to offer comments to the Office of Pesticide Programs' request for information in response to the proposed extension to the deadline by which Federal, State, territory, and tribal certifying authorities with existing certification plans are required to revise their plans to meet updated Federal standards for the certification of applicators of restricted use pesticides (RUPs - Docket No. EPA-HQ-OPP-2021-0831).

The International Certified Crop Adviser (ICCA) Program is the globally recognized certification held by professional crop advisers establishing their leadership role in the responsible management of agricultural production systems. Across North America, over 13,500 men and women serve farmers, ranchers, and other agricultural entities as Certified Crop Advisers (CCAs) providing information and expertise on crop production, crop protection, and natural resource management. CCAs play a pivotal role in conservation practice and technology adoption throughout the North American agricultural landscape. Due to their extensive agronomy training and in-field experience, they are deeply trusted by their farmer clients and routinely consulted on critical on-farm decisions.

Many CCAs are certified pesticide applicators or work closely with pesticide applicators to help producers manage crop pests using integrated pest management (IPM) principles. IPM principles aim to reduce the amount of pesticide applied by using the optimal rate at the optimal time when pests reach an economically harmful population. Restricted use pesticides (RUPs) are a necessary tool to control pervasive pests in many agricultural settings. Proper pesticide applications are particularly important when dealing with pesticide resistant pests, a challenge that reduces agricultural production across the country. RUPs applied at the improper weed growth stage or pest threshold may increase the likelihood of resistance.

The ICCA program supports the proposed extended deadline for certifying plans to be updated and approved by the EPA in order to maintain continuity for pesticide applicators. If any certifying plans were to expire, disallowing pesticide applicators from applying RUPs, this could lead to negative consequences for producers aiming to control crop pests and could also cause environmental harm if pesticides must be applied outside of the ideal time range. EPA should take every step possible to assure

that pesticide applicators can continue to work side-by-side with producers to control crop pests using best management practices.

We appreciate the opportunity to comment on this issue. As the EPA and Office of Pesticide Programs move forward, we ask that CCAs and pesticide applicators are provided with ample information and clarity regarding updated certification guidelines. Further, educational resources should accompany any certification changes in order to assure that pesticide applicators are using the safest and most responsible practices. Please do not hesitate to reach out if we can provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Luther Smith". The signature is fluid and cursive, with a large, stylized initial "L" and "S".

Luther Smith, CAE
Interim CEO and Director Professional Development