

August 12, 2015

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submission for the Docket – ID: EPA-HQ-OPP-2015-0389

These comments are submitted to the docket in response to EPA’s solicitation for public comment on its white paper, “Risk Management Approach to Identifying Options for Protecting the Monarch Butterfly.” American Farm Bureau Federation is the nation’s largest general farm organization, representing farmers and ranchers in all 50 states engaged in the production of nearly all crops and livestock produced in America. We appreciate this opportunity to comment on EPA’s white paper.

EPA identifies two elements of its approach: (1) seeking input from a diverse group of stakeholders; and (2) identifying activities that will balance weed management needs across varied landscapes with conservation of the milkweed plant. AFBF believes that these two elements are fundamentally sound. EPA will undoubtedly play an important role in the federal government’s program to identify ways to assist in protecting the monarch butterfly. Given the intersection of policies, especially pesticide policies, that could affect milkweed and agricultural production, AFBF believes it is entirely appropriate and correct for the agency not to embark on initiatives or policies that could affect farmers without first consulting them. Secondly, we believe it is critical for the agency to balance weed management needs with efforts to assist the monarch butterfly.

As indicated in the white paper, a component of an EPA-led program may well be to improve or enhance habitat for the monarch, a strategy that could lead to ways of fostering broader growth of milkweed, a plant that is critical in the lifecycle of the monarch. EPA notes in its paper that “in certain scenarios, such as crop production, milkweed plants in an agricultural field are considered weeds, and their presence may be incompatible with other goals of these land uses.” We agree with this statement. Further, we agree with EPA’s statement that “identifying situations in which areas of milkweed can be preserved” must be done “in a manner that balances this objective with weed management needs.” We wish to underscore these two critical points made by the agency. For farmers, their livelihood and success is inextricably tied to the land; their ability to be successful – to produce and sell a crop that will sustain them and their families – is dependent upon how well they can manage their land.

In that context, we believe EPA should adopt the kind of balanced approach that this paper appears to advocate. Several times in the paper the agency mentions the need to take a balanced approach, viz.

“We will look to our stakeholders to provide input for developing actions that are meaningful and are aimed at the protection of the monarch butterfly and its habitat but **that are also balanced with respect to landowners needs for weed and vegetation management.**” (emphasis added)

“EPA will contribute to ongoing Monarch butterfly conservation efforts by identifying situations in which areas of milkweed can be preserved in a manner that **balances this objective with weed management needs.**” (emphasis added)

“EPA understands that efforts to reduce the impact of herbicides on milkweed **must take into account the weed management needs of the sites being treated.** In certain scenarios, such as crop production, milkweed plants in an agricultural field are considered weeds, and their presence may be incompatible with other goals of these land uses.” (emphasis added)

“EPA believes that open communication with the full range of stakeholders engaged on this issue will be important in order to identify and coordinate actions that can be taken to protect Monarch butterfly and its resources **in a manner that also considers weed and vegetation management needs in the varied landscapes where herbicides are used.**” (emphasis added)

We strongly urge EPA to adhere to this approach – i.e., balancing weed management needs with the policy goals of assisting monarch butterfly populations. Additionally, as pointed out by EPA, reaching out to affected groups and stakeholders is an important component in developing a strategy. We also agree with this aspect of EPA’s approach. It will be critically important for EPA to initiate and maintain a robust, transparent stakeholder process throughout any initiatives relative to the monarch butterfly. This will particularly be the case should the agency seek to promote growth of milkweed on, adjacent to or near working agricultural lands. While the agency has commendably stated that it will balance weed management needs with those of the monarch butterfly, this goal cannot be achieved without the active input and approval of agricultural stakeholders. We believe farmers and ranchers should be closely involved in helping to craft and shape any policies that seek to promote milkweed growth in agricultural settings.

While these two components appear to be the foundation of EPA’s approach to protecting the monarch butterfly, we would like to comment on other aspects of the paper.

EPA mentions in passing that it received a petition from the Natural Resources Defense Council asking that EPA “take actions to reduce the use of the herbicide, glyphosate” due to its purported impact on milkweed and, indirectly, the monarch butterfly. EPA states that, while it denied the NRDC petition, its monarch risk management approach, in conjunction with other efforts, is “in line with the objectives of the NRDC petition.” We disagree with EPA’s characterization and strongly urge that this comment either be stricken from the risk management approach or be substantially modified. The goal of the NRDC petition, in our view, was not to protect the monarch butterfly; we believe NRDC, like other organizations that are opposed to the use of pesticides, is utilizing the monarch as a means to an end: the goal of the petition was to reduce the use of glyphosate. EPA should not, even indirectly, indicate that its risk management approach is in line with a policy that the agency has not – and should not – endorse. Glyphosate is an approved pesticide that has undergone rigorous evaluation by the agency. The agency should not imply that it agrees with a petition that it is designed to curtail or eliminate its use. We strongly urge that the agency strike this phrase from the risk management paper.

Secondly, EPA states in the paper that it “envisions that its effort should not be limited to looking at just one or two herbicides, but across a number of herbicides.” While we respect the agency’s goal

of identifying ways to assist the monarch butterfly, we are concerned at what could be a wide-ranging review of an unknown number of crop protection tools that are important to farmers. Should EPA proceed down this path, we urge the agency to work through the stakeholder process you have mentioned to ensure that farmers and ranchers are not harmed by limitations on pesticides that are important to their operations.

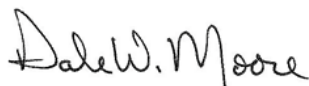
EPA notes in page 4 of the document that it will “identify actions to conserve the milkweed plant where it is important to Monarch butterflies.” No actions are identified, nor is this statement counter-balanced (as others) with the need to respect the weed management needs of farmers and others. It should be modified to reflect the agency’s view and should affirm that the agency will not take actions to conserve milkweed that will be detrimental to production agriculture. Later in that same paragraph, the document states that “a number of actions could be taken to protect monarch butterflies – for example, requiring changes to pesticide label instructions such as: lowering the rates, decreasing the frequency; modifying the timing of applications; or establishing spray drift buffers in fields that are treated with pesticides in order to protect critical milkweed resources.” We have a number of concerns with this passage.

First, the agency has outlined a far-ranging set of initiatives – changes in label language related to rate of application, decreasing the frequency of application, modifying the timing of application or establishing spray drift buffers. These are all critical areas of concern to agricultural producers. They should not be contemplated without a full discussion with producers and registrants to gauge their impact. Moreover, we believe the agency should first initiate the stakeholder process earlier referred to before contemplating such changes.

Secondly, the agency has used the term “critical milkweed resources.” We do not know what this phrase means. We are concerned that some might use it to attempt to limit farmers’ ability to manage their crops. For instance, if the agency were to designate some “critical milkweed resource” as something adjacent to or near a farmer’s field and then impose spray draft buffers, it could have a critical impact on that farmer’s operation. Moreover, if EPA is contemplating such actions with a wide range of chemicals, it is impossible for us to evaluate exactly what impact this will have on agricultural producers. We urge the agency not to contemplate such approaches without first engaging affected stakeholders and coming to a better understanding of the terms involved.

We appreciate this opportunity to comment on the EPA’s monarch white paper and look forward to an ongoing dialogue with the agency on this important topic.

Sincerely,

A handwritten signature in black ink that reads "Dale W. Moore". The signature is written in a cursive style with a large initial "D".

Dale Moore
Executive Director
Public Policy