



September 21, 2018

Mr. Bill Reck
National Environmental Engineer
Conservation Engineering Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue, SW
South Building, Room 6136
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Submitted via regulations.gov.

Re: Proposed Changes to National Handbook of Conservation Practices for Natural Resources Conservation Service; Docket ID No. NRCS_FRDOC_0001-0255; 83 Fed. Reg. 42864 (August 24, 2018).

Dear Mr. Reck:

Thank you for the opportunity to provide comments to the United States Department of Agriculture's Natural Resource Conservation Service (NRCS) on proposed changes to its Conservation Practice Standards published August 24, 2018. We appreciate NRCS's work to continually update its standards to ensure they take the most recent, proven science into account.

We specifically offer comments on the proposed changes to the Integrated Pest Management (IPM) standard, which outlines NRCS's IPM practices "[o]n all land where pests are managed and crop-specific IPM systems have been developed by a land grant university (LGU) or other qualified crop consultants."¹ While the application of these standards may be limited, other federal programs look to NRCS policies for guidance on their own implementation of IPM practices, and it is important that the standard reflect scientifically sound pest management practices.

While the goals outlined in the proposed IPM standards are important, we believe the definition should directly reflect the federal definition of IPM set out in the 1996 Food Quality Protection Act (PL 104-170) and the Food, Conservation, and Energy Act of 2008 (PL 110-234). Congress defines IPM as "a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks."

¹ United States Department of Agriculture, Natural Resources Conservation Service, Proposed Full Text for Practice Standard Code 595, Integrated Pest Management, May 2018 at 1.

An effective IPM strategy will use a variety of methods to control pests, and any method may be used at any point in the process, as long as it will effectively minimize risks. In some situations, using a chemical method is the best way to do this while controlling pests. Accordingly, the purpose of IPM is not to reduce or eliminate the use of pesticides. Rather, IPM allows pesticide applicators to make their own, case-by-case decisions to meet pest management needs in a way that minimizes economic, health and environmental risks.

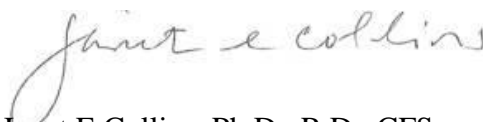
Given that the updates to the IPM standards as a whole recognize the role pesticides play in an IPM program, we believe the definition and purpose sections should be updated to reflect the federal definition of IPM, which advocates for the use of different pest management tools when appropriate. This will ensure applicators can both reduce risks and effectively control pests.

Thank you for reviewing our comments, and please contact us with any questions.

Sincerely,



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cc: Sheryl Kunickis, USDA Agricultural Research Service, Office of Pest Management Policy

RISE is a national not-for-profit trade association representing more than 220 producers and suppliers of specialty pesticide and fertilizer products to both the professional and consumer markets. RISE member companies manufacture more than 90 percent of domestically produced specialty pesticides used in the United States, including a wide range of products used on lawns, gardens, sport fields, golf courses, and to protect public health.

Established in 1933, CropLife America represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CropLife America's member companies produce, sell and distribute virtually all the crop protection and biotechnology products used by American farmers.