

May 20, 2021

To:

EPA Administrator Michael Regan

OCSPP Principal Deputy Assistant Administrator Michal Freedhoff

OPP Acting Director Edward Messina

**Subject: Support for the Rulemaking Petition to Implement a Soil Health Endpoint in EPA's Ecological Risk Assessment for Pesticides**

**The undersigned 67 public health, environmental justice, environmental, human rights, chemical reform, faith, sustainable farming, healthy soil and farmer advocates urge the U.S. Environmental Protection Agency (EPA) to act swiftly in granting the Center for Biological Diversity and Friends of the Earth's 5/20/21 petition to include an analysis of soil ecosystems in its pesticide registration decision-making process.** The petitioned for changes are necessary for the EPA to comply with its statutory requirements to only register pesticides if they do not cause any unreasonable risk to humans or the environment, as well as the agency's current guidance for assessing ecological risk.

Soils are incredibly complex and important ecosystems that are estimated to contain roughly a quarter of Earth's biological diversity. Thousands of species of soil invertebrates and microorganisms provide essential ecosystem services necessary for agricultural sustainability and ecological functioning, including carbon sequestration and resiliency in the face of global climate change.

It is estimated that 95% of the world's food comes either directly or indirectly from soil and that sustainable soil management could increase food production by 58%. Maintaining healthy soils is absolutely essential to ensuring robust and productive agriculture in the U.S. and a supply of healthy and nutritious food for future generations.

Pesticide toxicity to terrestrial invertebrates and soil application of pesticides have both been increasing over the last few decades, indicating that many soil organisms are under increasing threat from pesticide pollution. A recently published comprehensive review of pesticide impacts on soil found harm to beneficial invertebrates in 71% of cases. This finding demonstrates the urgent need to include a soil health endpoint in pesticide registration decisions.

Many species that spend some part of their life cycle in the soil, like ground beetles, ground-nesting bees and other terrestrial insects, have been precipitously declining in recent decades, and agricultural intensification and pollution are major driving factors. Worldwide, overuse of

chemicals in agriculture has been identified as the most impactful driver of soil biodiversity loss in the last decade.

At present, EPA assesses risk to all soil organisms using the European honey bee as a surrogate species. While it is critically important to have an adequate risk assessment for honey bees, using honey bees as a proxy does not reflect risk to soil microorganisms and invertebrates and does not address the indirect effects that loss of soil life can have on honey bees and other organisms. The agency must adopt a more comprehensive risk assessment framework that adequately values the ecological services of all life on Earth. A risk assessment based on the current knowledge of life systems must be adopted, protecting the environment and the food supply.

Our organizations fully support the soil health endpoint rulemaking petition that is in front of the EPA and urge the agency to immediately begin accounting for harms to soil organisms in its pesticide registration decisions even as it goes about granting the petition and incorporating the requested regulatory additions.

Signed,

American Sustainable Business Council

As You Sow

Bee Squared Apiaries

Beyond Toxics

Biodiversity for a Livable Climate

Boston Catholic Climate Movement

Catskill Mountainkeeper

Center for Food Safety

Central Maryland Beekeepers Association

Conservation Law Foundation

Cottingham Farm

Eastern Shore Food Hub

EcoHealth Network

Environmental & Public Health Consulting

Environmental Working Group

Fair Farms

Farm and Ranch Freedom Alliance

Farmworker Association of Florida

Georgia Organics

Global Evolutionary Alliance, LLC

Grantham Foundation

Green State Solutions

Hawai'i Alliance for Progressive Action

Healthy Soils Frederick of Frederick County, MD

Inga Foundation USA

Institute for Agriculture and Trade Policy

Kentucky Conservation Committee

Kiss the Ground 501c3

Land Core

Land Stewardship Project

Lexington Global Warming Action Coalition

Maryland Pesticide Education Network

Michael Fields Agricultural Institute

Mothers Out Front (National Leadership Team)

National Center for Appropriate Technology

National Latino Farmers & Ranchers Trade Association

National Sustainable Agriculture Coalition

Natural Resources Defense Council (NRDC)

New Growth Management

New Mexico Healthy Soil Working Group

Northeast Organic Farming Association of Massachusetts (NOFA-MA)

Northeast Organic Farming Association of New Hampshire (NOFA-NH)

Northeast Organic Farming Association of New Jersey (NOFA-NJ)

Northeast Organic Farming Association of New York (NOFA-NY)

Northeast Organic Farming Association of Rhode Island (NOFA-RI)

Northeast Organic Farming Association of Vermont (NOFA-VT)

Northeast Organic Farming Association-Interstate Council

Northern Plains Resource Council

Northwest Center for Alternatives to Pesticides

Ocean River Institute

Ohio Ecological Food and Farm Association

Organic Consumers Association

Pasa Sustainable Agriculture

People and Pollinators Action Network

Pesticide Action Network North America (PANNA)

Pollinate Minnesota

Pollinator Stewardship Council

Regeneration International

Rodale Institute

Safe Grow Montgomery

Savory Institute

Sierra Club

Slow Food California

Slow Food USA

Soil4Climate Inc.

Sonoma Safe Ag Safe Schools (SASS)

Women's Voices for the Earth