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
Hawaiʻi 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