

March 31, 2025

The Honorable Lee Zeldin  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Dear Administrator Zeldin:

Please accept the following comments on behalf of the Pesticide Registration Improvement Act (PRIA) Coalition, which represents the industry that manufactures and distributes pest control solutions for a diverse range of stakeholders, including growers, facilities managers, public health workers, animal health professionals, farmers, pet owners, pest control operators, lawn care professionals, and consumers. As you prepare the Agency's spending plan for the remainder of fiscal year 2025, we want to highlight the importance of funding the Environmental Protection Agency's (EPA) Office of Pesticide Programs (OPP) at the level mandated by the Pesticide Registration Improvement Act of 2022 (PRIA 5).

The FY 2025 Further Continuing Appropriations Act (PL 118-158) designated \$3.2 billion for EPA's Environmental Programs and Management (EPM) account and provided a degree of discretion to allocate these funds. In line with your stated focus on permitting reform, the PRIA Coalition recommends that EPA allocate \$147.1 million for pesticide licensing in the EPM account as part of the EPA's FY2025 spend plan. Combining this additional funding with the Fiscal 2024 funding levels for pesticide licensing of \$5.9 million in the Science and Technology Account and \$13 million in the State and Tribal Assistance Grants account, will ensure that PRIA's statutory requirement of \$166 million in funding for OPP is met. This request is outlined below.

Fiscal 2024 Funding for Pesticide Licensing		FY 2025 Proposed Funding for Pesticide Licensing	
EPM	\$115.375 million	EPM	\$147.1 million
S&T	\$13 million	S&T	\$13 million
STAG	\$5.9 million	STAG	\$5.9 million
<b>TOTAL</b>	<b>\$134.275 million</b>	<b>TOTAL</b>	<b>\$166 million</b>

This proposed funding for pesticide licensing is critical in registering and permitting the use of new and innovative pesticide products that protect our food supply, the public health, infrastructure and green spaces. We are grateful that you recognized the importance of these products when laying out the five pillars that will guide EPA's work over the first 100 days and beyond. In your National Agriculture Day press release you said, "EPA is working to improve the speed and efficiency of our review of new pesticides while protecting human health and the environment, to help our farmers grow more food and protect crops from pest damage, diseases, and weeds." We support and applaud the work that you and the Office of Pesticide Programs are undertaking to make the pesticide permitting process more efficient, but the goal of meeting the

law's prescribed timeframes for registration and registration review cannot be fully realized unless OPP is provided with sufficient staff and the additional resources required under the law.

The nation's 16 Critical Infrastructure Sectors rely on the resilience of assets, systems, and networks that are considered vital to national security. These include, but are not limited to, farmers, food manufacturers, agrichemical inputs, health care facilities, utilities, government agencies, military facilities, and law enforcement. Pesticides play an essential role in protecting crops, hospitals, first responders, military personnel, homes, pets, livestock, yards, landscapes, sports fields, trees, structures, highway and utility rights-of-way, and transportation routes. Accordingly, a well-resourced and transparent pesticide regulatory program is critical to the interests of all Americans.

EPA actions related to the registration or registration review of products must be conducted in a manner consistent with the science-based regulatory process required under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), but the registration process must be transparent and adhere to PRIA's statutorily mandated deadlines. We appreciate your focus on achieving this goal. The PRIA Coalition remains steadfast in its support for OPP and has undertaken robust advocacy campaigns to support the regular and timely reauthorization of PRIA. Our goal is to strengthen the business-critical pesticide licensing activities performed by OPP, improve regulatory outcomes, and ensure that OPP has the capacity to fulfill its mission of registering pesticides according to predictable timelines while safeguarding human health and the environment.

We appreciate the difficult decisions that you and President Donald J. Trump are making to improve efficiencies in the federal government. Thank you for recognizing the necessity of EPA's role in promoting innovation and protecting life sustaining sectors of the economy. We appreciate your leadership and urge your continued commitment to maintaining a robust, science-driven, and efficiently managed OPP within the EPA. We welcome the opportunity to work collaboratively to improve the performance of the program's core regulatory functions.

Sincerely,

American Chemistry Council's Center for Biocide Chemistries  
Animal Health Institute  
Biological Products Industry Alliance  
Biotechnology Innovation Organization  
CropLife America  
Council of Producers & Distributors of Agrotechnology  
Household & Commercial Products Association  
ISSA, The Worldwide Cleaning Industry Association  
RISE (Responsible Industry for a Sound Environment)

Cc: Russell Vought, Director, Office of Management and Budget