

USA Dry Pea and Lentil Council
Policy Positions 2012

Crop Protection Regulations

Over the past several years the Administration and Congress have repeatedly passed regulations that have increased the cost of producing farm commodities. If US pea, lentil and chickpea growers are to compete effectively, these regulations need to be reviewed and modified to reach the environmental goal without sacrificing the industry's competitiveness.

1. Crop Protection Labels. The USADPLC plans to forward the following emergency and special label requests to EPA for the upcoming crop year. It is critical that these crop protection materials be approved by EPA prior to spring planting:

- a. Section 18 Emergency Use for **Lorox® (Linuron)** in lentils as a pre-emergent control of chamomile mayweed and Pursuit® (imazethapyr) resistant prickly lettuce.
- b. Section 3 Federal Label for **Lorox (Linuron)** in lentils, dry peas and chickpeas.
- c. Section 3 Federal Label for **Butyrac® (2,4-DB)** in lentils as post-emergent control of broadleaf weeds.
- d. Section 3 Federal Label for **BeLeaf® (Flonicamid)** in dry peas, lentils and chickpeas to control sucking insects like aphid and lygus bug.
- e. Continued support for the Section 3 Federal Label for **Dimethoate** to control aphid in peas and lentils.

2. Crop Protection Harmonization. Improved crop protection tools are a major goal of the USADPLC, but without wide acceptance of Maximum Residue Limits (MRLs), new products risk becoming an artificial barrier to trade. USADPLC is working on the following efforts to harmonize MRLs and improve access to newer crop protection materials:

- a. **Harmonization of MRL's.** To prevent serious disruptions in trade, MRLs should be harmonized between our trading partners. Many of our partners use the CODEX standard as their default MRL. Currently, the CODEX standards lack MRLs for many widely used crop protection products. **USADPLC supports the efforts of our agency partners—EPA, IR-4, FAS and others to add MRLs for pulse crops to all our trading partners but particularly the CODEX.**
- b. **Use of Crop Groups:** Crop Groups in the USA are used to gain maximum use of residue testing. Multiple crops within one group are registered with the MRL established for a single “representative” crop. With this system, an MRL established with trials for dry peas can be applied to lentils and chickpeas. **USADPLC endorses efforts by US IR-4 and EPA to gain acceptance for this system in the CODEX standards and with our trading partners.**
- c. **Establish International Crop Zones.** Crop Zones are another method of making residue testing more efficient. International crop zones encourage international cooperation and joint registrations by combining work done in several geographic region rather than just one country. **The USADPLC supports sharing both data and regulatory capacity through the use of expanded international crop zones and crop use patterns to evaluate residue data. USADPLC supports increases in capacity to improve the responsiveness for gaining CODEX MRLs.**
- d. **NAFTA Label.** A NAFTA (North American Free Trade Agreement) label honored by all NAFTA participants would enable equal access to crop protection materials, prevent trade barriers created by differences in maximum residue levels (MRL) and establish uniform safety measures within the trade zone.

3. IR-4 Program & Pesticide Registration \$14.0 million. The USADPLC supports funding for the IR-4 program to assist in the registration of crop protection products for specialty crops. The USADPLC supports an appropriation of \$14.7 million in FY 2013 to fund IR-4 programs. In addition, the USADPLC also supports other regional programs to register new products for minor crops.