



November 1, 2017

Ms. Dea Zimmerman
Pesticide Program Dialogue Committee (PPDC)
Environmental Protection Agency
Office of Pesticide Programs, Mail Code 7506C
1200 Pennsylvania Ave., NW Washington DC 20460

RE: Comments for US EPA Pesticide Program Dialogue Committee Meeting on November 1-2, 2017

Dear Ms. Zimmerman, Pesticide Program Dialogue Committee, and Meeting Participants:

Thank you for the opportunity to submit comments as part of your meeting. Our organization, the Product Stewardship Institute (PSI) is a national non-profit organization comprised of 47 state environmental agency members, hundreds of local government members, and 110 corporate, academic, non-U.S. government, and organizational partners that work to reduce the health and environmental impacts of consumer products. This past year, we conducted a national initiative on pesticide stewardship, funded by the US Department of Agriculture, to understand and raise awareness of the key issues and potential solutions to the problems associated with the end-of-life management of unwanted pesticides, which can pose the same environmental and public health risks as new pesticides.

As part of our national initiative, we developed a [Pesticide Stewardship Briefing Document](#) and held a [National Pesticide Stewardship Webinar Discussion](#) that included 86 participants from 23 US states and representatives from industry as well as federal, state/provincial, and local government (environmental protection, health, public works, agriculture, and pesticide regulation departments). With input from a range of stakeholders, we identified several key issues:

- a persistent problem of stockpiles of unwanted pesticides on farms;
- a lack of dedicated funding for many state-run pesticide disposal programs;
- funds provided for pesticide disposal do not often adequately cover the costs of collection and disposal;
- a general lack of readily available, comprehensive information on the magnitude of the waste pesticide problem in the U.S.; and
- a lack of awareness about the risks of improper disposal and/or where to dispose of unwanted pesticides.

Also, emerging from our research and multi-stakeholder discussion was the identification of data and information gaps, including:

- The extent to which the pesticide registration fee in each state is helping to fund collection and disposal of discarded pesticides, and the products that fall within the scope of these funds (e.g., ag, households, commercial businesses, etc.) to determine the degree of need for additional and sustainable financing for pesticide collection and disposal.

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- National data regarding the current collection infrastructure (permanent facilities and programs, collection events, and intermittent programs) for discarded pesticides and containers to identify the existing level of convenience and the gaps in that convenience.
- Data estimates on the number, magnitude, and types of materials being kept in stockpiles in each state to understand the scope of this problem.

Based on the findings of our recent work on pesticide stewardship, we urge the PPDC and the US Environmental Protection Agency (EPA) to put resources to resolving the problems of unwanted pesticides. We respectfully suggest that a useful starting point would be for EPA to obtain current national data on pesticide disposal funding and costs, collection infrastructure, and unwanted pesticide stockpiles as indicated above.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Suna Bayrakal".

Suna Bayrakal
Senior Associate for Policy and Programs