May 9, 2025

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

Dear Administrator Zeldin:

On behalf of the Pesticide Registration Improvement Act (PRIA) Coalition, we commend the U.S. Environmental Protection Agency for its recent announcement to strengthen the Office of Chemical Safety and Pollution Prevention (OCSPP) and to add staff to the Office of Pesticide Programs (OPP) to address the over 12,000 pesticide reviews that are well beyond their statutory timelines. We hope this reorganization represents meaningful progress toward addressing the pesticide registration backlog and improving the transparency and efficiency of the regulatory process.

We strongly support the work that you, OSCPP leaders, and the OPP team are undertaking to modernize and streamline pesticide permitting. We believe that the statutory timeframes set forth under the Pesticide Registration and Improvement Act (PRIA) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) can be met through a combination of process efficiency improvements and investments in staffing and resources. PRIA 5, enacted in December 2022, requires that Congress appropriate a minimum of \$166 million annually for pesticide licensing activities. We hope that the President's Fiscal Year 2026 budget request will honor the law's requirement, and that Congress will appropriate the required funds. A fully funded, transparent, and science-driven OPP is essential to ensuring that growers, public health professionals, facility managers, animal caretakers, consumers, and other users have access to the critical tools they need to protect our public health, food supply, natural resources, infrastructure, and green spaces from pests.

Under PRIA, the Agency committed to complete an independent, third-party workforce and process assessment and to develop a training curriculum to improve the scientific, technical, and administrative skills of OPP employees. The assessment is critically important to improving OPP's service and is intended to review and make recommendations about OPP's processes and performance. The training program establishes a competitive grant program and awards funding to a land grant university or other qualifying higher-learning institution to promote consistent regulatory decision making and improve program efficiency. This training program will be extremely valuable as EPA works to increase OPP staffing levels. We encourage OPP to promptly move forward with the assessment and training program to identify critical process and infrastructure deficiencies, to determine what regulatory improvements and process efficiencies can be made, and to ensure the consistent and predictable administration of the pesticide permitting program.

The PRIA Coalition remains steadfast in its support for OPP and has consistently advocated for transparent and timely regulatory outcomes and enhanced OPP capacity. We are committed to

working with the Agency and Congress to ensure OPP has the staff and resources it needs to meet statutory obligations and maintain a predictable, science-based registration process.

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)