November 6, 2026

The Honorable Amy Klobuchar
Ranking Member
Committee on Agriculture
U.S. Senate
328A Russell Senate Office Building
Washington, DC 20510

The Honorable Angie Craig
Ranking Member
Committee on Agriculture
U.S. House of Representatives
1301 Longworth Building
Washington, DC 20510

Re: Opposition to unacceptable pesticide provisions within the *Farm, Food, and National Security Act of 2026* and *Agricultural Act of 2026*

Fundamental and longstanding precepts in law, governing public health and the environmental safety standards on pesticides and conservation, are seriously undermined in the proposed House and Senate Farm bills. We, therefore, urge those working on a negotiated bill to remove Title X, "Subtitle B—Regulatory Reform" from the Senate Bill, S.5526, *Agricultural Act of 2026,* also contained in Title X Subtitle C, "Part 1, *Federal Insecticide, Fungicide, and Rodenticide Act*" of H.R. 7567, *Farm, Food and National Security Act of 2026.* The language is a sweeping set of exemptions, waivers, and revocations undermining 50 years of environmental laws adopted by Congress to protect farmers, families, and the environment.

The provisions, discussed below: (i) Undermine pesticide safety reviews and standards, (ii) Undercut endangered species protections, (iii) Exempt synthetically derived chemicals from safety reviews, (iv) Waive reviews for chemical categories, and (v) Delay pesticide safety reviews by five years for chemicals in wide use today.

The provisions in the House and Senate Farm bills abandon public health and environmental principles and values, and our nation's long-term well-being.

While there have been serious cutbacks and deregulation in health and environmental protections under the Trump administration, the structural changes in the Farm Bill, if not removed, will institutionalize the rollbacks that have occurred—undermining critical programs. While current laws governing pesticide registration, use, and exposure have serious limitations as currently written, the identified pesticide and endangered species provisions in the Farm Bill will turn the clock back on safety standards and reviews by a generation or more and should be removed from any legislation moving forward.

Key among the issues of critical concern are the following:

1. **Pesticide Safety Reviews and Standards Undermined.** The U.S. Department of Agriculture (USDA), as well as the Department of Interior and the Department of Commerce, are given new veto authority over EPA's pesticide registration process by requiring "coordination" on safety decisions and introducing a pesticide "benefits" analysis into health-based law. (This is referred to in the bill as an "economic analysis" for any future pesticide risk mitigation measures in the context of chemical-dependent

farming.) The *Food Quality Protection Act* (1996), which amends laws governing pesticides (*Federal Insecticide, Fungicide, and Rodenticide Act*/FIFRA) and food safety (*Federal Food, Drug, and Cosmetic Act*/FFDCA), establishes standards based solely on health and environmental effects, stipulating cumulative risk assessments and standards for dietary and nondietary pesticide exposure. With the Farm Bill's expanded mandates for management of pesticide registration at USDA, this would tilt the review scale in favor of industry, rather than families. Instead, Congress should invest more in the EPA's Office of Chemical Safety and Pollution Prevention. (Section 10202 in House Bill, Sections 10209 and 10208 in Senate Bill)

2. **Endangered Species Protection Undercut.** EPA will not be able to enforce "any policy, strategy, workplan, or pilot program" related to protections under the *Endangered Species Act* (ESA) without consulting with a FIFRA Interagency working group, effectively blocking any further protections for threatened or endangered species due to industry influence. (Section 10203 in House and Senate Bill)

3. **Synthetically Derived Chemicals Exempt from Safety Reviews.** Safety reviews will be waived for pesticides defined as "low-risk profile" because they are "synthetically derived, but structurally similar and functionally identical to substances of biological origin," waiving safety reviews of families of pesticides like hazardous synthetic pyrethroid insecticides, similar to natural pyrethrins (from chrysanthemums), but linked to cancer and neurological effects. Neonicotinoid insecticides, linked to dramatic declines in native and honey bee populations, are synthetic versions of nicotine that are linked to endocrine disruption, and neurological and reproductive effects. Many highly toxic pesticides are synthetically formulated to mimic chemicals found in nature, but have never been exempt from longstanding EPA safety review protocol because of "similar" but different molecular structures, metabolic effects, and overall chemical toxicology. (Section 10201 in House and Senate Bill)

4. **Reviews of Plant-Incorporated Protectants (PIPs), which Can Be Genetically Engineered, Would Be Waived.** EPA is given wide discretion to determine that PIPs, a euphemism for plants that have incorporated pesticides through genome editing, are "of a character which is unnecessary to be subject to this Act," meaning they are exempt from safety reviews, despite wide distribution throughout the environment and food supply. (Section 10201 in House and Senate Bill)

5. **Deadline for Reviewing Pesticide Safety Extended for Five Years after Missing a 15-Year Deadline.** EPA's failure to meet the most basic health and environmental safety reviews of widely used toxic pesticides, like the weed killer glyphosate, is codified without any assurance that pesticides will be reviewed. The failure of the agency to conduct complete registration reviews since the 1996 FQPA statutory mandate over 30 years ago exemplifies a true public health and environmental crisis, with approximately 80% of toxic pesticides on the market with a September 2026 deadline for review (approximately 580 pesticides) that do not have final registration determinations. (See

examples with scientific citations of hazards here.) This threat requires that Congress set a sunset deadline for review, meaning that, if further review deadlines are not met, the chemical automatically loses its registration and is removed from commerce. (Section 10204 in House Bill, Section 10207 in Senate Bill)

These provisions demand that the leadership in the Agriculture Committees of both the House and Senate reject harm to foundational structures established by Congress over decades to protect health and the environment from pesticides. Clearly, in this time of public health, biodiversity, and climate crises, the statutory and regulatory structures need to be improved upon and enhanced, not torn down to meet chemical industry interests that are dreadfully harmful.

Please remove Title X, "Subtitle B—Regulatory Reform" from the Senate Bill, S.5526, *Agricultural Act of 2026,* also contained in Title X Subtitle C, "Part 1, *Federal Insecticide, Fungicide, and Rodenticide Act*" of H.R. 7567, *Farm, Food and National Security Act of 2026.*

Thank you for your attention to this profoundly consequential matter.

NATIONAL ORGANIZATIONS
Beyond Pesticides, *District of Columbia*
Center for Food Safety, *California*
Center for Biological Diversity, *District of Columbia*
Alliance of Nurses for Healthy Environments, *Maryland*
Alianza Nacional de Campesinas, *California*
American Bird Conservancy, *District of Columbia*
As You Sow, *California*
Breast Cancer Prevention Partners, *California*
Center for Environmental Health, *California*
Center on Race, Poverty & the Environment, *California*
Children's Environmental Health Network, *District of Columbia*
Climate Justice Alliance, *California*
Coming Clean, *Vermont*
Compassion in World Farming, *New York*
Environmental Health Trust, *Maryland*
Environmental Working Group, *District of Columbia*
Family Farm Defenders, *Wisconsin*
Farm Action, *Missouri*
Food and Water Watch, *District of Columbia*
Food Babe, *North Carolina*
Food Chain Workers Alliance, *California*
Friends of the Earth, *District of Columbia*
Grassroots Environmental Education, *New York*
Green America, *District of Columbia*
HEAL (Health, Environment, Agriculture, Labor) Food Alliance, *Maryland*

Institute for Agriculture and Trade Policy, *Minnesota*
Latino Farmers & Ranchers International, *Maryland*
Learning Disabilities Association of America, *District of Columbia*
Lymphoma Foundation of America, *Michigan*
Moms Across America, *North Carolina*
National Family Farm Coalition, *District of Columbia*
National Farm Worker Ministry, *North Carolina*
Native Organizers Alliance Fund, *Washington*
Natural Resources Defense Council, *New York*
Non Toxic Communities, *California*
Non-Toxic Neighborhoods, *South Carolina*
Naturepedic Organic Mattresses, *Ohio*
Organic Consumers Association, *Minnesota*
Organic Farmers Association, *Iowa*
Pesticide Action & Agroecology Network, *California*
Pesticide Free Zone, *California*
Pollinator Pathway, *Connecticut*
Pollinator Stewardship Council, *Minnesota*
Public Employees for Environmental Responsibility, *Maryland*
Rachel Carson Council, *Maryland*
Real Organic Project, *Vermont*
Rural Coalition, *District of Columbia*
Sierra Club, *District of Columbia*
Toxin Free USA, *Connecticut*
Xerces Society for Invertebrate Conservation, *Oregon*

STATE, REGIONAL, AND LOCAL ORGANIZATIONS
350 Bay Area Action, *California*
350 Eugene, *Oregon*
350 Southland Legislative Alliance, *California*
Acta Non Verba Youth Urban Farm Project, *California*
Active San Gabriel Valley, *California*
Alaska Community Action on Toxics, *Alaska*
Allensworth Progressive Association, *California*
Bay Area-System Change not Climate Change, *California*
Bear Warriors United, *Florida*
Bee Friendly Williamstown, *Massachusetts*
Beyond Toxics, *Oregon*
California Communities Against Toxics, *California*
California Environmental Justice Coalition, *California*
California Nurses for Environmental Health and Justice, *California*
California Rural Legal Assistance Foundation, *California*
Californians for Pesticide Reform, *California*
Campaign for Organic and Regenerative Agriculture, *California*

Campesinas Unidas Del Valle De San Joaquin, *California*
Ceres Community Project, *California*
Center for Farmworker Families, *California*
Central California Environmental Justice Network, *California*
Central Valley Immigrant Integration Collaborative, *California*
Champlain Valley Apiaries, *Vermont*
Church Women United in New York State, *New York*
CleanEarth4Kids.org, *California*
Coastwalk/ California Coastal Trail Association, *California*
Committees for Land, Air, Water and Species, *California*
Connecticut Botanical Society, *Connecticut*
Court Nativity of Our Lady #931, *New York*
Dakota Rural Action, *South Dakota*
Defend Our Health, *Maine*
Defend Them All, *Oregon*
Don't Spread On Me, *Virginia*
Earth Ethics. Inc., *Florida*
East Norwalk Blue, *Connecticut*
Ecological Options Network, *California*
El Granada Advocates, *California*
Elders Climate Action Northern California Chapter, *California*
Elders Climate Action Southern California Chapter, *California*
Endangered Habitats League, *California*
Environmental Protection Information Center, *California*
Ethical And Respectful Treatment of Humans, *Georgia*
Families Advocating For Chemical and Tech Safety, *California*
Farm2People, *California*
Farmworker Association of Florida, *Florida*
Farmworker Self-Help, *Florida*
Fitnall LLC, *Tennessee*
Florida Veterans for Common Sense, *Florida*
Foodwise, *California*
For a Better Bayou, *Louisiana*
Freshwater Accountability Project, *Ohio*
Fullwell, *California*
Good Earth Natural Foods, *California*
Grayson Neighborhood Council, *California*
Greenaction for Health and Environmental Justice, *California*
Green State Solutions, *Iowa*
Grow Safe: Non-Toxic Missoula, *Montana*
Hawai'i SEED, *Hawai'i*
Heather Feather Apothecary, *California*
Informed Green Solutions, *Vermont*
James's Solar, *California*

Jefferson County Farmers and Neighbors, Inc., *Iowa*
Kanalani Ohana Farm, *Hawai'i*
Kentucky Resources Council, *Kentucky*
Learning Disabilities Association of Alabama, *Alabama*
Learning Disabilities Association of Illinois, *Illinois*
Learning Disabilities Association of Minnesota, *Minnesota*
Learning Disabilities Association of New Hampshire, *New Hampshire*
Learning Disabilities Association of New York State, *New York*
Learning Disabilities Association of Ohio, *Ohio*
Learning Disabilities Association of South Carolina, *South Carolina*
Learning Disabilities Association of Utah, *Utah*
Long Beach Gray Panthers, *California*
Los Jardines Institute, *New Mexico*
Louisiana Progress, *Louisiana*
Maine Organic Farmers and Gardeners Association, *Maine*
Marin Food Policy Council, *California*
Maryland Legislative Coalition, *Maryland*
Maryland Ornithological Society, *Maryland*
Maryland Pesticide Education Network, *Maryland*
Massachusetts Pollinator Network, *Massachusetts*
McDaniel Honey Farm, *Maryland*
Missouri Coalition for the Environment, *Missouri*
Missouri River Bird Observatory, *Missouri*
Moniteau County Neighbors Alliance, *Missouri*
Montana Environmental Information Center, *Montana*
Mothers Out Front, *Massachusetts*
Move Past Plastic, *Pennsylvania*
Natural Grocers, *Colorado*
Naturalist For You, *California*
New York River Watch, *New York*
Norfolk County Beekeepers Association, *Massachusetts*
Northcoast Environmental Center, *California*
Northeast Organic Farming Association, Interstate Council, *New York*
Northeast Organic Farming Association, Connecticut Chapter, *Connecticut*
Northeast Organic Farming Association, Massachusetts Chapter, *Massachusetts*
Northeast Organic Farming Association, New Hampshire Chapter, *New Hampshire*
Northeast Organic Farming Association, New Jersey Chapter, *New Jersey*
Northeast Organic Farming Association, New York Chapter, *New York*
Northeast Organic Farming Association, Vermont Chapter, *Vermont*
North American Marine Alliance, *Massachusetts*
Northeast Organic Dairy Producers Alliance, *Massachusetts*
Norwalk River Watershed Association, *Connecticut*
Organizacion en California de Lideres Campesinas, *California*
Our City SF, *California*

Parents Against Santa Susana Field Lab, *California*
PCC Community Markets, *Washington*
People and Pollinators Action Network, *Colorado*
People Organized in Defense of Earth and Her Resources, *Texas*
People for Protecting Peace River, Inc., *Florida*
Pewaukee Green Team, *Wisconsin*
Physicians for Social Responsibility Kansas City, *Kansas*
Physicians for Social Responsibility Maine, *Maine*
Physicians for Social Responsibility Pennsylvania, *Pennsylvania*
Physicians for Social Responsibility Sacramento, *California*
Physicians for Social Responsibility Texas, *Texas*
Pollinator Pathway Stamford, *Connecticut*
Progressive Action Coalition for Equity, *Minnesota*
Project Reuse, *Hawai'i*
Protect Our Watershed San Mateo County, *California*
Protect Our Pollinators, *Connecticut*
Pulling at the Roots, *New York*
Russian Riverkeeper, *California*
R6TAcres, LLC, *Michigan*
Récolte Energy, *California*
RE Sources, *Washington*
San Francisco Bay Physicians for Social Responsibility, *California*
Save The Park, *California*
Social Justice Alliance, *Florida*
Sonoma County Youth Environmental Action Committee, *California*
Suncoast Jewish Alliance, *Florida*
Texas Environmental Justice Advocacy Services, *Texas*
Think Like a Bee, *New Mexico*
Toxic Free NC, *North Carolina*
Turning Green / Conscious Kitchen, *California*
Unitarian Universalist of Venice, *Florida*
Valley Improvement Projects, *California*
Web of Life Products, *Colorado*
West Berkeley Alliance for Clean Air and Safe Jobs, *California*
Wild Ones Mountain Laurel Chapter, *Connecticut*
Wisconsin Organics, *Wisconsin*
YardSmartMarin, *California*

INTERNATIONAL ORGANIZATIONS
Coordination gegen BAYER-Gefahren (Coordination against BAYER Dangers), *Germany*