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8700 Executive Woods Dr., Suite 400
Lincoln, NE 68512-9612

Ph: (402) 476-1528

Visit Our Website at www.na-ba.com
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August 21, 2024

Jean Overstreet
Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Submitted electronically via [regulations.gov](https://www.regulations.gov)

RE: Docket ID: EPA-HQ-OPP-2009-0059

Dear Ms. Overstreet,

On behalf of the Nebraska Agri-Business Association (NeABA), a trade organization representing agricultural retailers, distributors, and manufacturers of agriculture input products, I would like to comment on the U.S. Environmental Protection Agency’s (EPA) Proposed Registration Review Interim Decision (PID) for Dimethoate.

Our members sell and provide commercial applications of crop protection products for Nebraska farmers and ranchers. These products are essential for protecting their crops from pests and yield loss. As the state’s largest industry, agriculture is vitally important to the strength and stability of Nebraska’s economy.

I am writing to express my concerns regarding potential restrictions on the use of Dimethoate, particularly its critical role in protecting Nebraska’s agricultural production.

Dimethoate has been a reliable and effective tool for controlling aphid populations. Corn and soybeans are vital not only to the local economy of Nebraska but also to the national agricultural output. Aphids, including the corn leaf aphid and the soybean aphid, severely threaten these crops by stunting growth, reducing yields, and spreading plant diseases. Dimethoate is one of the few pesticides that can manage these pests effectively.

Moreover, Nebraska’s unique climate and agricultural practices mean that aphid infestations can quickly become severe, further underscoring the need for effective pest control measures. Losing Dimethoate as a control option would leave many farmers with inadequate means to protect their crops, leading to yield loss.

Dimethoate is also essential in managing winter grain mites, which can cause extensive damage to wheat crops. These pests feed on the plants during the cooler months, leading to reduced yields and poor crop quality. The impact of these mites can be devastating if not effectively managed.

Dimethoate has been one of the few reliable and cost-effective solutions available to control these pests, ensuring that farmers can maintain healthy and productive fields.

The lack of viable alternatives amplifies the concern over the restriction of Dimethoate. Many of the available options are either less effective, more expensive or carry their own environmental and health risks. The absence of Dimethoate would force farmers to turn to these less optimal solutions, increasing the cost of production and potentially compromising crop yields and quality.

I understand the need for environmental and health considerations in the use of pesticides, and I support efforts to ensure the safety and sustainability of agricultural practices. Our association supports and holds educational training throughout the year on the proper handling, mixing, and application of pesticides. I urge the EPA to carefully weigh the benefits of maintaining the use of Dimethoate against the potential risks. The economic and food security implications for Nebraska and other agricultural states are significant, and any decision regarding the restriction of this pesticide should consider the critical role it plays in protecting our crops.

Thank you for considering my concerns. I hope that the EPA will continue to support the agricultural community by allowing the continued use of Dimethoate, ensuring that farmers have access to the tools they need to protect their crops effectively.

Sincerely,

A handwritten signature in black ink that reads "Scott Merritt". The signature is written in a cursive, slightly stylized font.

Scott Merritt
President