

April 23, 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 20515

**Re: Oppose Farm Bill Section 10204's 5-year Extension of Pesticide Registration Review Deadlines**

Dear Ranking Members Klobuchar and Ranking Member Craig,

In addition to other harmful provisions within the House Farm Bill, we write separately to set forth our opposition and concerns with Section 10204, which extends all final pesticide registration review decisions that the Environmental Protection Act must make until 2031. A five-year extension is unwarranted and would set up a recurring dynamic wherein the pesticide industry will inevitably seek a five-year extension in every future five-year farm bill, taking all pressure off of the EPA to actually assess and address the human health and environmental impacts of pesticides.

The EPA Office of Pesticide Programs (“OPP”) continues to fail to meet its 15-year periodic obligations under the Federal Insecticide, Rodenticide, and Fungicide Act (“FIFRA”) to assess whether each pesticide active ingredient is causing unreasonable adverse effects. OPP continues to struggle to meet Congress’ mandates to assess pesticides, continues to have difficulty meeting its obligations under the Endangered Species Act, and has made virtually no progress removing the most dangerous pesticides from the market, including those pesticides that are banned in dozens of other nations because of the extreme dangers they present, including but not limited to carcinogenicity.

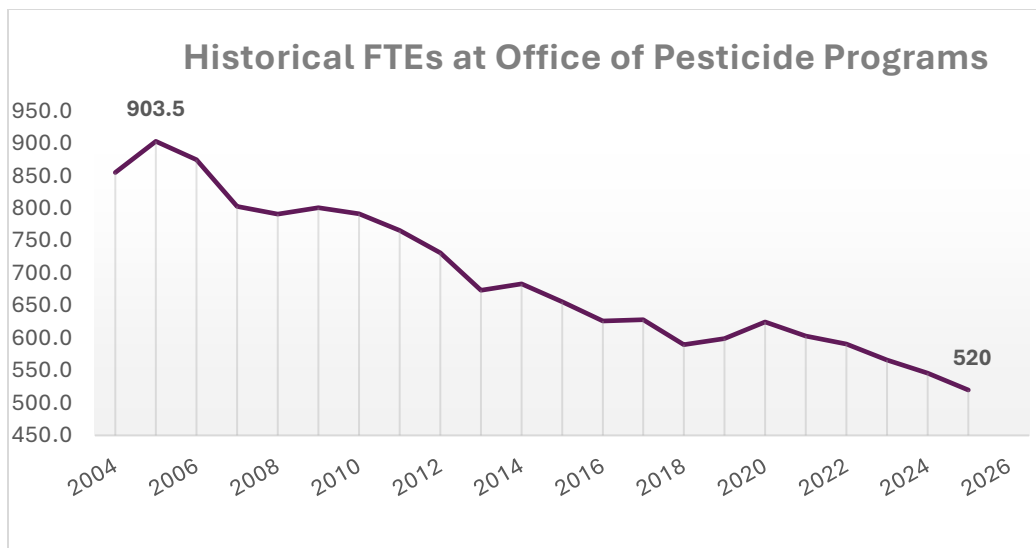
The main cause of OPP’s numerous backlogs in assessing pesticides is lack of staffing and funding. Over the past 20 years, Congressional appropriators — especially Republican appropriators — have steadily starved OPP of funding. As a result, OPP’s staffing has fallen from 900 FTEs in 2005 to just 520 today.<sup>1</sup> Combined with DOGE cuts and chaos in 2025 and early 2026, the OPP will continue to flounder in Congress’ mandates under the law. Vital modernization efforts such as electronic labeling — supported by industry, farmworker advocates and environmental organizations alike — are stymied due to chronic and shortsighted funding shortfalls.

Republicans have long sought to “drown the federal government in a bathtub,” then decry the failures of the federal government, and then use those failures as a rationalization for even greater deregulation to the benefit of industry and special interests. This strategy has certainly

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<sup>1</sup> The Office of Pesticide Programs received a one-time infusion of staff following the illegal dismantling of the EPA Office of Research and Development. Without those staff additions, OPP would likely have approximately 480 FTEs in 2026, and after natural attrition continues, OPP will likely fall below 500 FTEs in 2027.

achieved a significant level of success with respect to the EPA Office of Pesticide Programs. The consequence of this is clear: OPP cannot complete the legally required review of hundreds of pesticide active ingredients by 2026. Every day, dangerous pesticides including neurotoxic organophosphates, endocrine disrupting atrazine, pollinator killing neonicotinoids, and dozens of other chemicals banned in the European Union and elsewhere continue to be applied to our nation's food supply, causing substantial harms to human health and the environment. Extending OPPs deadlines for reviewing any and all dangerous pesticides without exception for five more years is simply a legally sanctioned abdication of EPA's duties to protect ordinary Americans from dangerous pesticides.



As the FIFRA 2026 deadline to complete registration review continues to approach later this year, we recognize that OPP will almost certainly fail to meet Congress' mandates and that an extension will be needed for most pesticide active ingredients. But this extension cannot be premised on a status quo in which the health of ordinary Americans and our environment pays the price for this continued inaction. We believe that FIFRA deadlines must be conditioned on substantial progress every year wherein OPP completes reviews for the most dangerous pesticides first and foremost. If OPP fails to meet binding targets, then all registration review deadlines would automatically reset to 2026.

In crafting legislation to address the upcoming FIFRA registration review deadline, Congress should require annual binding targets and benchmarks as integral components to any legislative extension. We believe the following requirements should be incorporated into legislation and that each yearly extension be dependent on the following:

- Mandatory minimum staffing level reached within five years of 1000 FTEs within the Office of Pesticide Programs, annually increasing every year by 100 FTEs and a mandate to prohibit reductions in force and other workforce reduction tactics through 2032.
- Mandatory funding by Congress for the EPA Office of Pesticide Programs for the next five year period from 2028 to 2032 of no less than \$400 million per year that are not subject to the annual appropriations process to ensure that OPP's FTE targets are achievable.

- Mandatory funding of \$50 million per year to each of the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and U.S. Department of Agriculture to ensure all legal requirements for pesticide registrations are fully complied with and that farmers are provided necessary technical support to implement new mitigations as part of that review.
- For each year beginning in 2027, OPP must complete registration review for no less than 100 pesticide Active Ingredients per year, beginning in 2027 with pesticides that have been banned in other nations: organophosphates, atrazine, paraquat and neonicotinoids.
- For all of the above, if Congress or the OPP do not meet the required targets and benchmarks, then all FIFRA registration review deadlines reset back to 2026.

The structure of FIFRA allows a pesticide active ingredient and the pesticide products that contain it to remain on the market unchanged, until and unless the EPA Office of Pesticide Programs requires changes to those products to better protect human health and the environment through the registration review process, or until EPA determines through this process that a pesticide product must be removed from the market.

Consequently, the real-world reality of the five-year extension sought by House Republicans in Section 10204 is simply this: environmental protections delayed are environmental protections denied. If Congress grants this five-year extension once, it will, like most riders in appropriations laws and elsewhere become a permanent feature of future legislation.

We urge you to oppose Section 10204 in addition to the many other poisonous provisions within the Food, Farming, and National Security Act of 2026, and instead work towards providing accountability to the public, giving the EPA the support and staff it needs to complete its mission, and ensuring that public health and our environment are protected from dangerous pesticides.

Thank you for your consideration,

Animal Welfare Institute  
 Center for Biological Diversity  
 Center for Biological Diversity Action Fund  
 Center for Food Safety  
 Endangered Habitats League  
 Endangered Species Coalition  
 Environmental Protection Information Center (EPIC)  
 Family Farm Defenders  
 Farmworker Association of Florida  
 Food and Water Watch  
 Friends of the Earth  
 FOUR PAWS USA  
 Friends of Merrymeeting Bay  
 Hawk Mountain Sanctuary  
 Indiana Forest Alliance  
 Kettle Range Conservation Group  
 Klamath Forest Alliance  
 Maryland Pesticide Education Network

Massachusetts Pollinator Network  
New Hampshire Audubon  
Northwest Center for Alternatives to Pesticides  
People & Pollinators Action Network  
Re:wild Your Campus  
Toxic Free North Carolina  
Washington Wildlife First  
Western Watersheds Project  
Western Wildlife Outreach  
WildEarth Guardians  
Wolf Hollow  
Wyoming Untrapped