



December 13, 2021

Chris Chinn  
Director of the Missouri Department of Agriculture (MDA)  
1616 Missouri Blvd  
Jefferson City, MO 65102

**RE: Revisions to Labels of Currently Registered Pesticide Products**

Dear Ms. Chinn:

The Responsible Industry for a Sound Environment (RISE), CropLife America (CLA), and the Household & Commercial Products Association (HCPA) are sending this communication in response to the September 29, 2021, letter sent to pesticide registrants, outlining the policy for how the Missouri Department of Agriculture (MDA) will manage pesticide product label revisions, beginning January 1, 2022. While we appreciate MDA reviewing label revisions in comparison to the currently registered pesticide label, we are concerned that the policy shift requiring a new product registration and \$200 product registration fee for all label revisions deemed “significant changes” to the currently registered label sets a precedent that will place undue regulatory burden on registrants, MDA, and small businesses. Therefore, we respectfully request a meeting with you and your staff to discuss this policy.

We are especially concerned that changes to the *directions for use, storage and disposal*, and *PPE* would be deemed a “significant change” to the label such that they would require a new registration in Missouri along with a \$200 registration fee. This requirement is precedent setting, in that no other states require a new state registration for such labeling revisions<sup>1</sup>. In addition, such label changes occur frequently, whether at the registrant’s initiative or when required by EPA for risk mitigation; hence, this policy would create a significant regulatory burden for both MDA and registrants without a measurable benefit to the protection of human and the environment. Also, this policy requiring the need to maintain the registrations for prior versions of the labels, as long as the product remains in the channels of trade, would result in multiple Missouri registrations for the same EPA registration number. Maintaining Missouri state registrations for multiple label versions of a given product with one EPA registration number will likely be an administrative and logistical challenge for MDA and registrants; a significant potential source of confusion for pesticide users; and a substantial economic burden for registrants; especially for small business.

We respectfully request a meeting with MDA leadership prior to this policy going into effect to discuss this policy and our concerns. We are eager to meet with MDA to learn more about this

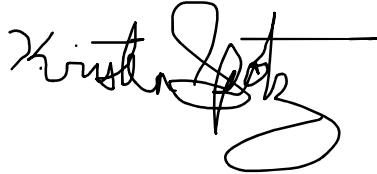
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<sup>1</sup> Note that California’s Department of Pesticide Regulation (CDPR) must approve each label amendment before allowing sale of products with the amended label. CDPR does charge a nominal one-time fee (2% of registration fee) required at time of submission for amendments, not considered a registration fee but is a cost of reviewing the amendment.

policy and the impetus behind it, along with how we might work together to resolve this issue while serving the broader stakeholder community.

We kindly thank you for your time and attention to this matter. We look forward to hearing back from you.

Sincerely,



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C.c. Chris Klenklen, Deputy Director, MDA; Kristi Naught, General Counsel, MDA; Paul Bailey, Plant Industries, MDA; and Dawn Wall, Pesticide Program Administrator, MDA.

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Established in 1933, CropLife America ([www.croplifeamerica.org](http://www.croplifeamerica.org)) represents the developers, manufacturers, formulators, and distributors of plant science solutions for agriculture and pest management in the United States. CropLife America's member companies produce, sell and distribute virtually all the crop protection and biotechnology products used by American farmers.

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The Household and Commercial Products Association (HCPA) is the premier trade association representing companies that make and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers create cleaner, healthier and more productive lives.

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RISE is a national not-for-profit trade association representing more than 220 producers and suppliers of specialty pesticide and fertilizer products to both the professional and consumer markets. RISE member companies manufacture more than 90 percent of domestically produced specialty pesticides used in the United States, including a wide range of products used on lawns, gardens, sport fields, golf courses, and to protect public health.