

**Testimony of Jay Vroom
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**Before the Domestic Policy Subcommittee,
House Oversight and Government Reform Committee**

“Are Superweeds and Outgrowth of USDA Biotech Policy”

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Thank you, Chairman Kucinich and Ranking Member Jordan, for the opportunity to address the Subcommittee on behalf of CropLife America and its members, as well as their customers the American farmers. CropLife America is the leading trade association representing the U.S. crop protection industry and our members supply virtually all of the crop protection products used by American farmers. CropLife America’s member companies, and members of our counterpart association at RISE¹, proudly discover, manufacture, register and distribute crop protection products for American agriculture, and specialty use products outside of agriculture, such as those used for public health protection and commercial pest management inside of homes and commercial buildings.

CropLife America members work with farmers, ranchers and growers everyday to ensure that crop protection tools are registered properly and used correctly. As a matter of fact, America’s abundant, affordable food supply depends on the availability of safe, effective crop protection products. Careful use of crop protection products contributes substantially to production of U.S. farm exports valued at some \$100 billion per year. CropLife America members support modern agriculture by looking forward: each year the agrochemical industry spends hundreds of millions of dollars on research and development, with much of that investment going into producing data that meet or exceed the Environmental Protection Agency’s (EPA) information requirements and requests for pesticides.

¹ Responsible Industry for a Sound Environment (RISE) – www.pestfacts.org

Three major points are essential to understanding weed resistance to herbicides and the need for best management practices to minimize the potential for resistance development:

- First, herbicide resistance occurs naturally, and best management practices need to be applied in ensuring that resistance development is avoided or delayed.
- Secondly, the market can and will facilitate the development of solutions to combat the issue of weed resistance in crop production to ensure production of safe, affordable, and plentiful food.
- Third, the current regulatory framework for herbicides is robust.

Weeds, insects and fungi readily adapt genetically to their environments. Pesticides and other pest control technologies, used over widespread areas, will control many target pests, but some pests may have a genetic advantage and survive. The survivors, if not removed from fields physically or with an alternative chemical control option, will grow and become more prominent in the local environment. Weed adaptation has been happening as long as man has tried to grow crops and is not unique to the use of chemical control or adoption of biotech crops. Under a regimen of physical control, weeds might become physically harder to distinguish or more difficult to remove. While ‘superweeds’ might be a catchy moniker, there is nothing particularly super about the weeds that have developed resistance to any particular herbicide. Resistance of a particular weed species to a particular herbicide has arisen multiple times over the past several decades. The problems have been overcome through adjustments to the use of the specific herbicides, and through availability and use of additional herbicides and weed control strategies, all acting by different mechanisms, so that no one weed species or variety can escape all of the control approaches.

To avoid the onset of resistance growers need to be aware of and adopt best management practices (BMPs). Information regarding BMPs and integrated weed management is available from multiple reliable sources. Growers who ignore that information do so at their peril, with potentially serious economic consequences. Adoption of biotechnology hasn’t caused the rapid onset of resistance in weed species; appropriate use of all technologies will reduce its impact.

The market can and will facilitate the development of solutions to the issue of weed resistance in crop production to ensure production of safe, affordable and plentiful food. Farming is a long-term investment, and growers will adapt their operations to succeed. They need the flexibility to manage their farm operations for the current season and for the future. That flexibility requires access to the tools that enable them to take care of their business interests and sufficient latitude in terms of how and when they are used. Growers are in the best position to know their fields, the weeds growing in them, and how to best manage their farm inputs. Such knowledge will enable them to make the best decisions on what tools to use, including crop protection products and biotech crop seed, considering the economics and their future management plans.

Weed control options will continue to be developed. Crop protection is a competitive business. If a weakness in a particular weed control option emerges, there will be other new or existing technologies that will seek to fill that void. The market favors maximization of the tools currently available. The development of new herbicides is an involved and expensive process. To make that investment worthwhile requires that the useful life of a product will be extended as long as possible with available means. Some recent marketing programs have included manufacturer rebates for use of competitive products in combination with a company's product, in order to stem the onset of resistance. This is one example of how the market addresses the issue.

Regulation of pesticides, including herbicides, is science-based, stringent, thorough and robust. The approval process and use of pesticides are overseen by the Environmental Protection Agency (EPA) through implementation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Development and registration of a new pesticide active ingredient takes 8 to 10 years, costs over 200 million dollars, and requires at least 120 scientific studies, conducted at the manufacturer's expense and thoroughly reviewed by EPA. EPA must approve the product label before it grants a "registration" for sale and use of the product. The label contains the necessary instructions and precautions to use the product safely and effectively. When used according to the label, registered pesticides will not harm humans, animals or the environment. EPA continues to monitor use of the pesticide in the marketplace. If problems in product efficacy are discovered by EPA or the registrant or users, adjustments are made as necessary to the label

instructions to make sure the product can continue to be used safely and effectively. The changes may be initiated either by EPA or the manufacturer, but must be approved by EPA.

I appreciate the opportunity to appear before the Subcommittee today to discuss the important issue of resistance management on behalf of the chemical crop protection industry. We remain committed to continuing to work with the Congress, our regulator and our end-users who use our technology to produce our nation's safe, affordable and abundant food supply. I look forward to answering any questions you may have regarding my testimony.