



June 18, 2025

The Honorable Mike Simpson
Committee on Appropriations
Chairman, Subcommittee on Interior
United States House of Representatives
Washington, DC 20515

The Honorable Chellie Pingree
Committee on Appropriations
Ranking Member, Subcommittee on Interior
United States House of Representatives
Washington, DC 20515

Dear Chairman Simpson and Ranking Member Pingree:

The National Association of State Departments of Agriculture (NASDA) commends the subcommittee for its work in support of farmers, ranchers, and rural communities. NASDA represents the Commissioners, Secretaries, and Directors of agriculture in all 50 states and 4 territories. NASDA members are co-regulators with the federal government and strong advocates for American agriculture.

As you begin the fiscal year (FY) 2026 appropriations process, NASDA asks you to prioritize the following programs that enhance farmers, ranchers, and rural communities and ensure a safe, affordable, and abundant food supply.

State and Tribal Assistance Grants (STAG)

State and Tribal Assistance Grants provide states with vital cost-share funding to administer their co-regulatory implementation, use, and enforcement pesticide responsibilities as obligated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). NASDA requests that STAG programs are funded at least at their fully authorized levels. This level of funding is critical as states must meet substantially increased pesticide enforcement and compliance burdens pertaining to the Endangered Species Act.

The Pesticide Cooperative Enforcement cooperative agreements, Pesticide Applicator Certification and Training grants, and Pesticides Program Implementation cooperative agreements are critical categorical grants for maintaining state pesticide co-regulatory duties. These grants allow state enforcement agencies to continue their necessary enforcement and compliance duties as well as improve safe and effective outcomes for end-users by translating complex pesticide regulatory decisions into practical materials regarding the Agricultural Worker Protection Standard, Certification and Training Programs, Endangered Species Protection Program, Integrated Pest Management, and more.

Additionally, STAG funding supports the continued operation of the State FIFRA Issues Research & Evaluation Group (SFIREG), a vital forum for co-regulatory coordination between EPA and state pesticide enforcement agencies on regular and emerging issues.

Office of Pesticide Programs (OPP)

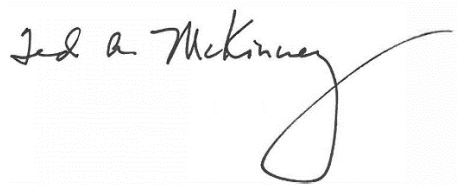
NASDA requests funding for EPA's Office of Pesticide Programs (OPP) at least at its fully authorized level to ensure timely registration reviews and regulatory workload management. As OPP faces increasingly complex registration and registration review requirements, it is paramount that it receives the resources necessary to meet decision timelines. Adequate resources and support are especially important in light of potential reorganization decisions in EPA that may place additional personnel in OPP. Since the enactment of the Pesticide Registration Improvement Act (PRIA), Congress has intended for industry fees to supplement annual appropriations. PRIA requires the termination of the fee program if a minimum level of appropriations is not provided.

U.S. Fish and Wildlife Service (USFWS)

NASDA supports funding for the U.S. Fish and Wildlife Service (USFWS) at least at its fully authorized level in order to meet their pesticide consultation obligations and to manage their Endangered Species Act (ESA) workloads promptly. The USFWS and the National Marine Fisheries Service (NMFS) have the primary authority to protect threatened and endangered species. The ESA also requires other federal agencies to consult USFWS and NMFS when any action the agency carries out, funds, or authorizes may affect a species listed as threatened or endangered under the Act or any critical habitat designated for it. Courts have ruled that the process EPA has utilized to meet the consultation requirement is inadequate. This has resulted in the revocation of product registrations and uses. This additional funding would allow for additional full-time employees to be used for pesticide consultations, of which USFWS faces a significant backlog in its current timeline.

NASDA thanks you for your careful consideration of these requests as you work to fund the programs that enhance farmers and ranchers and ensure a safe, affordable, and abundant food supply. If you have any questions, please contact RJ Karney, Senior Director Public Policy, RJ.Karney@nasda.org.

Sincerely,

A handwritten signature in black ink, reading "Ted McKinney", with a large, stylized loop at the end of the signature.

Ted McKinney
Chief Executive Officer