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IMPACTS OF EPA SOIL FUMIGANT REDS ON REGENERATING AMERICA'S FORESTS

Soil fumigant pesticides are essential chemicals used in the production of tree seedlings to eliminate harmful insects and diseases prior to planting. With the help of fumigants, forest and conservation nurseries produce approximately 1.6 billion seedlings each year. These seedlings aid in the reforestation of approximately 2.4 million acres of forest lands annually, roughly equivalent to planting trees on every square mile of Delaware and Rhode Island. Many of these seedlings contribute to reforestation efforts following hurricanes, wildfires, and other natural disasters.

BACKGROUND ON RE-REGISTRATION ELIGIBILITY DECISIONS (REDS)

The U.S. Environmental Protection Agency (EPA) is requiring new safety measures for soil fumigant pesticides to avoid risk of exposure to agricultural workers and others who live, work, or are otherwise located in nearby areas. These measures are defined in each fumigant's risk management Reregistration Eligibility Decisions (REDs).

The new safety measures were set primarily using highly conservative exposure assessments generated by various air dispersion models. The models grossly over-predict potential emissions from field fumigation sites and are not supported by 40-50 years of experience using soil fumigants safely without any incidents to forest nursery employees, bystanders or neighbors.

STATE FORESTERS' CONCERNS WITH REDS

State agencies, forest landowners, forest industry, forest scientists and professional foresters have strongly opposed the proposed rules due to severe, unjustified adverse economic impacts and unintended negative environmental consequences. If EPA's proposed mitigation measures are not suspended, forest nurseries expect the following:

- **Double or triple costs of seedling production.** With dramatic increases to the production of tree seedlings, some commercial nurseries will be out of business. Constrained budgets make state-owned nurseries (already operating on thin margins) vulnerable as well. Currently, there are no cost effective alternatives to meet reforestation needs.
- **Reduced nursery production capacity.** Nurseries will be forced to use other pesticides which are often not as effective in providing clean, disease-free seedlings. For instance, Indiana and Oklahoma expect increased root diseases and weeds to cause a 30-50% reduction in productive capacity with the mitigation requirements. An estimated 80-100% reduction in seedling production in the Southeast U.S. presents concerns for reforestation efforts following hurricanes while Western states question their ability to replant forests impacted by devastating wildfires.
- **Increased reforestation costs.** Reduced production and higher costs will translate into increased cost per seedling. In many cases, these costs will be passed on to private forest landowners discouraging interest and subsequent investment in forestry.
- **Limited ability of key Farm Bill reforestation programs.** Reduced production limits key Farm Bill programs' (e.g., CRP, BCAP, EFRP, EQIP) ability to provide reforestation assistance to families and individuals who own forest land.

PROPOSED NEXT STEPS

NASF strongly suggests EPA **suspend the proposed mitigation measures** until there is some common set of requirements agreeable with nurseries and commercial soil fumigators which also meets the needs of EPA. We encourage a **review of the science** used to create the REDs. **Additional time and research funding** is also needed to develop alternative cropping systems before the regulations are implemented.

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