

June 16, 2025

Dear Senator,

As organizations dedicated to environmental protection, human health and wellbeing, and access to justice, we write in strong opposition to any efforts to limit existing state and local authority to regulate pesticides and lock-in outdated science. This includes, but is not limited to:

- [Petitions](#) of the EPA to preempt state labeling requirements.
- Section 10204 of the Farm, Food, and National Security Act of 2024 (i.e., the House farm bill) This language would prevent states from requiring warning labels that are different from federal labels, and tie EPA decisions to outdated risk assessments.
- Section 10205 of the Farm, Food, and National Security Act of 2024 (i.e., the House farm bill)
- Section 461 of the House FY24 Interior, Environment, and Related Agencies Appropriations Bill, which would tie EPA decisions to outdated risk assessments.

These efforts serve only to limit the ability of the EPA, states, and localities to protect their people and environment from the harms of pesticide use, while shielding companies from liability for their products' harms.

The Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA") sets the federal floor on pesticide safety. Under FIFRA, states and localities have the authority to impose restrictions on sale and use that are more stringent than federal requirements or require warnings and other information designed to allow consumers to make informed decisions about pesticide use and exposure.

Preemption takes decision-making out of the hands of those most impacted by pesticide use. States and localities are often in a much better position than the EPA to quickly assess risks, consider emerging evidence, and make decisions to protect their unique local environments and communities, including schools and childcare facilities, from toxic pesticides. Undermining that authority would hamstring critical local efforts to address cancer and other human health risks, threats to water resources, and harm to pollinators and other wildlife.

Preemption of state authority can also effectively immunize pesticide and chemical manufacturers from claims that they failed to warn consumers of health hazards that either they were aware of or should have been. State tort law is currently a critical complement to federal regulation of pesticides and provides people who have been harmed by a pesticide an avenue to seek relief from the company that harmed them. State tort law also incentivizes manufacturers to continue to monitor the safety of their products and ensure their labels reflect the known risks. Federal preemption would not only limit states' ability to regulate pesticides but can strip consumers of their right to accountability if they are made sick by a toxic pesticide.

By prohibiting the EPA from approving labels that are inconsistent with human health risk assessments performed by the agency, many of these provisions also hamstring the EPA's ability to respond to the most recent data regarding pesticide risks. The EPA is just beginning to make progress in addressing the widespread use of toxic pesticides, but shackling the agency to potentially outdated assessments that may not reflect the best science will impair the EPA's ability to take swift and necessary action to protect public health. For example, Section 461 of the House Interior Appropriations bill would prohibit any action deemed "inconsistent" with existing EPA assessments—which potentially includes the EPA's own efforts to protect the public from serious harm.

Federal pesticide preemption is contrary to FIFRA's intentional and long standing balance of authorities. We ask that you stand on the side of public health, accountability, and the environment instead of chemical industry profits and oppose all efforts to preempt state and local authority to regulate pesticides.

Sincerely,

**National Organizations:**

2020 Action

A Well-Fed World

Alianza Nacional de Campesinas, Inc.

Alliance of Nurses for Healthy Environments

American Association for Justice

American Bird Conservancy

American Federation of Teachers

Americans for Family Farmers

Animal Welfare Institute

Beyond Pesticides

Breast Cancer Prevention Partners

Campaign for Family Farms and the Environment

Center for Biological Diversity

Center for Environmental Health

Center for Food Safety

Center for Justice & Democracy

Chilis on Wheels

Clean Water Action

Climate Justice Alliance

Community Action Works

Consumer Reports

EarthAction

Earthjustice

Environmental Working Group

Families Advocating for Chemical & Toxics Safety (FACTS)  
Family Farm Defenders  
Farm Action Fund  
Farmworker Justice  
FOUR PAWS USA  
Friends of the Earth  
Greenaction for Health and Environmental Justice  
HEAL Food Alliance  
Health Care Without Harm  
Impact Fund  
Institute for Agriculture and Trade Policy  
League of Conservation Voters  
Mamavation  
Mason Farms Produce LLC  
MegaFood  
National Association of Pediatric Nurse Practitioners  
National Education Association  
National League for Nursing  
National Pollinator Pathway  
National Sustainable Agriculture Coalition  
Natural Resources Defense Council  
Next 100 Coalition  
Non Toxic Communities  
Organic Farming Research Foundation  
Organic Voices  
Partnership for Policy Integrity  
Pesticide Action and Agroecology Network  
Pollinator Stewardship Council  
Predator Defense  
Project Coyote  
Public Employees for Environmental Responsibility  
Re:wild Your Campus  
Resource Renewal Institute  
Rural Coalition  
Sacred America  
Sierra Club  
The Rachel Carson Council  
The Transformation Project  
The Weston A. Price Foundation  
The Xerces Society  
Union of Concerned Scientists  
United States Womens International League for Peace and Freedom  
Vision y Compromiso  
Web of Life Products

Wild Farm Alliance  
Wildlife for All  
Women, Food and Agriculture Network  
American Sustainable Business Network  
CleanEarth4Kids.org  
Defend Them All  
Farm Sanctuary  
Food & Water Watch  
Hungry Planet  
Inland Ocean Coalition  
Non-Toxic Neighborhoods  
Oceanic Preservation Society  
Pesticide Free Zone  
Re:wild Your Campus  
Regenerative Agriculture Coalition  
Society of Latinx Nurses  
The Ocean Project

**State and Regional Organizations:**

350 Bay Area Action  
Alaska Community Action on Toxics  
Bee Friendly Williamstown  
California League of United Latin American Citizens  
California Nurses for Environmental Health and Justice  
California River Watch  
California Safe Schools  
Californians for Pesticide Reform  
Campaign for Organic and Regenerative Agriculture  
Campesinas unidas del Valle de San joaquin  
Campesinas.unidas del Valle de San joaquin  
Catholic Charities of Stockton  
Central Valley Air Quality Coalition  
Central Valley Immigrant Integration Collaborative  
Chesapeake Climate Action Network  
Children Now  
Clean Wisconsin  
Climate Land Leaders  
Community Alliance for Global Justice  
CT NOFA (Northeast Organic Farming Association of CT)  
Des Moines County Farmers and Neighbors for Optimal Health  
El Concilio California  
El Granada Advocates

Elders Climate Action, Massachusetts,  
Endangered Habitats League  
Environmental Protection Information Center- EPIC  
Families Advocating for Chemical and Toxics Safety  
Farmworker Association of Florida  
Foodwise  
Georgia Beekeepers Association  
GMOScience  
Grayson Neighborhood Council  
Healthy Kids Happy Planet  
Henry County Farmers and Neighbors (Iowa)  
Humane Action Pennsylvania  
Idaho Conservation League  
Iowa Alliance for Responsible Agriculture  
Iowa CCI  
Iowa Environmental Council  
Jefferson County Farmers & Neighbors, Inc.  
JustServeLCC  
Klamath Forest Alliance  
Louisiana Food Policy Council  
Maine Audubon  
Maryland Children's Environmental Health Coalition [MD CEHC]  
Maryland Native Plant Society  
Maryland Ornithological Society  
Maryland Pesticide Education Network  
Maryland Votes for Animals, Inc.  
Massachusetts Pollinator Network  
Michiganders for a Just Farming System  
Missouri Coalition for the Environment  
Moms for a Nontoxic New York (MNNY)  
Montana Environmental Information Center  
Montgomery Countryside Alliance  
NC Environmental Justice Network  
Neighbors to Preserve Rural Sonoma County  
NH Audubon  
NOFA/Mass  
Non-Toxic Neighborhoods  
North Coast Rivers Alliance  
Northeast Organic Dairy Producers Alliance  
NORTHEAST ORGANIC FARMING ASSOCIATION OF NEW JERSEY  
Northeast Organic Farming Association of New York (NOFA-NY)  
Northeast Organic Farming Association of NH (NOFA-NH)  
Northeast Organic Farming Association of Vermont (NOFA-VT)  
Northeast Organic Farming Association-Interstate Council

Northwest Center for Alternatives to Pesticides  
Norwalk River Watershed Association  
Parkinson Association of Northern California  
People & Pollinators Action Network  
Poison Free Malibu  
PoisonFreeMalibu  
Prairie Rivers Network  
Progress Iowa  
Protect Our Pollinators  
Protect Wild Petaluma  
PVFT 1936  
Récolte Energy  
Rio Grande International Study Center  
San Diegans for Sustainable Equitable and Quiet Equipment in Landscaping  
Santa Cruz Climate Action Network  
Santa Cruz Climate Action Network  
SF/Bay Area NAHN Chapter  
Sierra Club Tennessee Chapter Chickasaw Group  
Smart on Pesticides Coalition of 112 organizations and businesses  
Sonoma County Climate Activist Network (SoCoCAN!)  
Southern California Association of Occupational Health Nurses  
Sprout  
Striving to Serve Others  
Sustainable Farming Assoc. of Minnesota  
Toxic Free North Carolina  
UFCW Local 5  
Vegan Activist Alliance  
Vibrant Gardening LLC  
Voters For Animal Rights  
Waterkeepers Chesapeake  
West Berkeley Alliance for Clean Air and Safe Jobs  
Western Watersheds Project  
Wild Ones Greater Baltimore  
Wild Seed Project  
Wood Botanicals