

TRIBAL PESTICIDE PROGRAM COUNCIL

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March 17, 2026

Alexandra Boukedes
Registration Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW, Washington, DC 20460

Re: Pesticide Registration (PR) Notice 2026-NEW: Notifications, Non-Notifications, and Minor Formulation Amendments

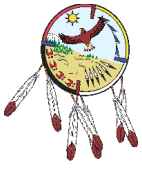
Dear Ms. Boukedes,

We appreciate the opportunity for the Tribal Pesticide Program (TPPC) to comment on the U.S. Environmental Protection Agency's (EPA's) Pesticide Registration (PR) Notice 2026-NEW: Notifications, Non-Notifications, and Minor Formulation Amendments. The TPPC is a member-based organization with 107 members from 68 Tribes and tribal organizations, whose activities are funded by a cooperative agreement with the EPA. The Council serves as a tribal technical resource, and provides a forum for dialogue between Tribes and the EPA on program and policy development relating to pesticides issues and concerns. Assistance provided to Tribes includes support in building tribal pesticide programs and conducting pesticide education and training, and the preparation of resources for Tribes interested in specialized issues such as Integrated Pest Management and pollinators. Through its interaction with the EPA, the TPPC keeps Tribes informed of developments in the regulation of pesticides and pesticide use, and provides feedback to the EPA on such matters from a tribal perspective. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the TPPC may not be agreed upon by all Tribes. Further, it is important to understand interactions with the organization do not substitute for government-to-government consultation, which can only be achieved through direct communication between the federal government and Indian Tribes.

On behalf of the Tribal Pesticide Program Council (TPPC), I submit these comments on EPA's Pesticide Registration (PR) Notice 2026-NEW: Notifications, Non-Notifications, and Minor Formulation Amendments.

In Section IV(M) on page 27 of the draft Pesticide Registration (PR) Notice 2026-NEW document there is a list of three situations in which EPA does not recommend adding Bulletins Live! Two (BLT) language to pesticide labels. TPPC reviewers have concerns about this section on two counts:

1. TPPC members feel that it would be better to include BLT language on all labels to ensure applicators get in the habit of checking BLT before applying pesticides, so that they can confirm there are no concerns around federally listed Threatened or Endangered Species with the use of their product in that specific area.



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2. TPPC members also take issue with the second situation, in which the agency does not recommend adding BLT language if all uses on the labeling have a “May Affect, Not Likely to Adversely Affect... determination....” Leaving the BLT language off the label in this situation could cause confusion among applicators and be seen as inconsistent with the intent of the Endangered Species Act. If an action may have any effect on listed species it would be prudent to include BLT language on the label to alert applicators of this possibility.

Once again the TPPC appreciates this opportunity to comment on EPA’s Pesticide Registration (PR) Notice 2026-NEW: Notifications, Non-Notifications, and Minor Formulation Amendments. If you have any questions, please contact TPPC coordinator Mark Daniels at mark.daniels@nau.edu or 928-523-8897.

Sincerely,

Renee Keezer
TPPC Chairperson