

TRIBAL PESTICIDE PROGRAM COUNCIL

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Charles Smith, Division Director, Registration Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW, Washington, DC 20460

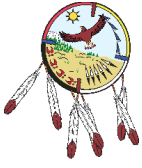
Re: Registration for the First Residential Use of Florpyrauxifen-benzyl (EPA-HQ-OPP-2022-0646)

Dear Mr. Smith,

We appreciate the opportunity for the Tribal Pesticide Program (TPPC) to comment on the U.S. Environmental Protection Agency's (EPA's) Proposed Decision to Approve Registration for the First Residential Use of Florpyrauxifen-benzyl. The TPPC is a member-based organization with 106 members from 67 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 Proposed Decision to Approve Registration for the First Residential Use of Florpyrauxifen-benzyl.

- Florpyrauxifen-benzyl meets the Minnesota definition of PFAS (<https://www.mda.state.mn.us/environment-sustainability/pfas-pesticide-active-inert-ingredients>). While EPA uses a narrower definition of PFAS that does not include compounds such as this, TPPC members remain concerned about the long-term environmental and health effects of these compounds and oppose registrations that allow for an increase in their use.
- The active ingredient has a short half-life in water and in terrestrial settings. However in aquatic habitats, it can persist for up to 12 months in the sediment layers from run-off which can create potential localized exposure for bottom-dwelling insects, mussels, and other organisms (<https://www.biorxiv.org/content/10.1101/2025.09.23.678083v1>).



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- Florpyrauxifen-benzyl generally has low toxicity to mammals, birds, and bees, but has high potential to drift on non-target broadleaf plants and aquatic vascular species. It has a low toxicity to standard freshwater fish and macroinvertebrates, though build-up in sediment can cause an exceedance of thresholds for specific sensitive vascular plants and benthic organisms (<https://www.mda.state.mn.us/sites/default/files/inline-files/Florpyrauxifen-benzyl.pdf>).

With these concerns in mind, the TPPC opposes the Proposed Decision to Approve Registration for the First Residential Use of Florpyrauxifen-benzyl, and urges EPA not to go ahead with the registration.

Once again the TPPC appreciates this opportunity to comment on EPA's Proposed Decision to Approve Registration for the First Residential Use of Florpyrauxifen-benzyl. 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