

TRIBAL PESTICIDE PROGRAM COUNCIL

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July 27, 2026

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

Re: Proposed Decision to Approve Registration for the Cotton New Use of Topramezone (EPA-HQ-OPP-2025-3291)

Dear Mr. Smith,

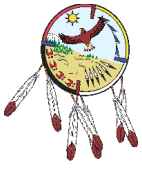
We appreciate the opportunity for the Tribal Pesticide Program (TPPC) to comment on the U.S. Environmental Protection Agency's (EPA's) proposed decision to approve registration for the cotton new use of topramezone. The TPPC is a member-based organization with 106 members from 67 Tribes and tribal organizations, 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 cotton new use of topramezone.

- Topramezone is persistent in soil, poses a high risk to groundwater due to its high water solubility, and has a high toxicity risk to non-target terrestrial plants via drift or runoff (<https://www.sciencedirect.com/science/article/pii/S0889157525008373>, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5959347#maincontent).
- Topramezone has a low potentiality for vapor drift due to low vapor pressure. It doesn't not readily vaporize off the soil or water surfaces but it carries a notable risk for particle (spray) drift. The recommended wind speed for this product is 3-10 mph. If this proposal is enacted the TPPC would recommend including wording on the label that applicators must use adjuvants and/or coarse spray to reduce the spray drift potential.

With these concerns in mind, the TPPC opposes the registration of topramezone for a new use on topramezone-resistant cotton, 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



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the cotton new use of topramezone. 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