



June 18, 2025

The Honorable Sam Graves
Chairman
House Committee on Transportation and
Infrastructure
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
House Committee on Transportation and
Infrastructure
2163 Rayburn House Office Building
Washington, DC 20515

Re: Support for the Clean Water Act Permitting Reform Package and H.R. 3824, the Reducing Regulatory Burdens Act

Dear Chairman Graves and Ranking Member Larsen,

On behalf of the Council of Producers and Distributors of Agrotechnology (CPDA), I am writing to express our strong support for the Clean Water Act Permitting Reform legislative package and, in particular, H.R. 3824, the *Reducing Regulatory Burdens Act*, introduced by Representative David Rouzer.

CPDA represents manufacturers, formulators, distributors, and suppliers of adjuvants, inert ingredients, and post-patent crop protection products. Our members are deeply committed to supporting science-based regulation and providing growers with access to effective and environmentally responsible tools to protect their crops. The redundant permitting requirements addressed by H.R. 3824 have long imposed unnecessary administrative burdens on applicators without delivering meaningful environmental benefit.

As the Committee is well aware, pesticides applied in accordance with EPA-approved labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) are already subject to rigorous regulatory oversight. The duplicative Clean Water Act NPDES permitting process for certain pesticide applications has created confusion, legal risk, and compliance costs for producers and applicators, particularly in emergency and time-sensitive scenarios where pest pressures can threaten yields and public health.

We applaud the Committee for its leadership in advancing this package and recognizing the need to streamline regulatory requirements in a manner that maintains environmental protections while reducing unnecessary red tape. Clarifying that FIFRA-compliant pesticide applications do not require additional NPDES permits under the Clean Water Act is a commonsense solution.

CPDA urges the Committee to favorably advance the Clean Water Act Permitting Reform package, including H.R. 3824, during its upcoming markup and to work toward full House



passage. We appreciate your continued efforts to modernize and improve federal permitting systems while maintaining our shared commitment to environmental stewardship.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry Kippley', is written over a light gray circular background.

Terry Kippley
President & CEO
Council of Producers & Distributors of Agrotechnology (CPDA)