Reviewer’s report

Title: The USA Lags Behind Other Agricultural Nations in Banning Harmful Pesticides

Version: 0 Date: 09 Feb 2019

Reviewer: Charles Benbrook

Reviewer's report:

Congrats, this is an important paper with unique information of value to people trying to assess regulatory policies/actions around the world. First, several general comments re ways to improve the paper. These numbered items deserve at least some discussion.1. You need to define/address risk trading more formally, in specific comments below I suggest one place.2. There is not 1 word re resistance, yet resistance is a major driver of registrant decisions to voluntarily cancel products. Plus, cancellations can have adverse resistance management repercussions, a reality that at least deserves mention.3. Author should add a para discussing the possible impact of the unprecedented concentration in the industry, after the 3 huge deals. The newly merged companies have all announced product line reviews to identify "redundancies." What this really means is they will drop lower profit margin a.i.s when they think they can replace acre-treatments with more profitable, and even better, proprietary products.4. Author definitely needs to discuss the inclination of registrants to allow voluntarily accept cancellations of products that recently have or will soon lose patent protection, when they have a "new/improved" proprietary replacement with either patent protection or data comp protection or both. E.g. alachlor>>acetochlor; metolachlor>>metalochlor-s.Editing: there are many long sentences, and long paras. Suggest breaking more sentences into 2; adding new commas, etc. Some specific places noted below. There are ~1 dozen awkward sentences that will benefit from rewriting; some examples below:Specific Comments:Line 75: make clear FQPA applies to tolerance setting in food crops, and has not changed FIFRA standard re cancellation. Line 92: "has" should be "have"; run-on sentence could be clearer. Lines 98-102: Fine to make case for bans, but must add discussion of risk trading. Bans that move acres-treated from one hazardous a.i. to another accomplish little. Line 112: need comma after "factors" Lines 127-128: revise. Break into 2? Line 142: Hope u can find a better descriptor than "(not approved)" How about (voluntarily phase-out)? Line 170: EPA formed in 1970 or 1972? Check. Line 240: Add comma after "former" Line 249: replace "and" with "that one" Lines 256-260: In fairness, should at least mention % paraquat poisonings from attempted/successful suicides. Line 291: add comma after "years" Line 292: would be better to say something like "the US EPA has not taken steps to meaningfully reduce use of and risks from the hazardous..." Line 300: add comma after "requirements"; maybe break into 2 sentences. Line 317-19: Awkward, not a good reference for this point. Plus, I am not sure overall OP use has declined in a "major" way. Should be more specific re decline. Line 320-321: Yes, "a role" but a "major role"?? Not in my book.

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Dr. Benbrook has served as an expert witness in litigation involving pesticides and the labeling of foods derived from genetically engineered ingredients. He currently serves as an expert witness for plaintiffs in litigation over glyphosate and non-Hodgkin lymphoma in the U.S.

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