



**Drexel Chemical Company**

March 27, 2025

**ATTN: Carolyn Smith** (email: [smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov))

Pesticide Re-evaluation Division

Office of Pesticide Programs (7508M)

**U.S. Environmental Protection Agency**

1200 Pennsylvania Ave. NW

Washington, D.C. 20460-0001

**RE: Species-specific conservation measures for Carbaryl Products**

**Drexel EPA Reg. No. 19713-75, 19713-49, 19713-627, 19713-630**

Dear Ms. Smith,

Drexel Chemical Company holds U.S. Environmental Protection Agency (EPA) registrations for carbaryl technical and certain end-use products in the United States. This communication provides a commitment from Drexel Chemical Company to voluntarily amend the terms of its carbaryl technical product registration and all relevant carbaryl-containing end-use product registrations to allow for the species-specific measures referenced in the U.S. Fish and Wildlife Service email from Irvin J. Huang dated March 25, 2025. This will allow revision of the Description of the Action being considered in the ongoing endangered species consultations with the FWS.

Drexel Chemical Company is committed to making these EPA-proposed label modifications with the understanding that additional end-user mitigation options may be added as they become available. We look forward to continued discussions with the EPA, FWS, and USDA in completing and implementing this Biological Opinion.

If you have questions/clarification regarding this submission, I can be reached at (901) 494-2974 or e-mail [mmccann@drexchem.com](mailto:mmccann@drexchem.com).

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

Melinda McCann  
Registration Department Manager