



December 16, 2019

OPP Docket
Environmental Protection Agency Docket Center (EPA/DC)
(28221T)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

RE: REGISTRATION REVIEW; AVAILABILITY: PARAQUAT DICHLORIDE DRAFT HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENTS; EPA-HQ-OPP-2011-0855

To Whom It May Concern:

On behalf of the Agricultural Retailers Association (ARA), I submit the following comments regarding the U.S. Environmental Protection Agency's (EPA) registration review process for paraquat dichloride (Docket # EPA-OPP-2011-0855). Paraquat dichloride, commonly referred to as paraquat, is an important herbicide used to control problem weeds impacting many important crops such as alfalfa, almonds, asparagus, berries, corn, cotton, dry beans, dry peas, peanuts, sorghum, soybeans, and other crops. It is also used as a desiccant.

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

ARA supports efforts that will provide more information and warnings to draw more attention to the toxicity of paraquat and how to safely handle and securely store the product in order to help prevent accidental injury or death. The high number of deaths (17) between 2000 and 2016 resulted from the ingestion of paraquat as a result of the product being illegally stored in beverage containers, contrary to clear label language prohibiting transfer into other containers. The label language prohibiting the transfer of paraquat into food or beverage containers has been in place well before that time period. Paraquat products are specifically formulated with stench agents and an emetic to deter bringing the product close to the face and swallowing. These features combined with increased product awareness are ample protections to prevent an accidental ingestion. Transferring pesticides into unauthorized / unlabeled containers is a deliberate act, not an accident, that requires the intentional violation of Federal law and product labeling, not the type of accidental exposure a closed system is intended to prevent. ARA is very concerned with the increased costs a closed system will place on the industry. Drexel Chemical Company has previously estimated these new and unnecessary requirements will cause paraquat products to increase in pricing by 25% to as high as 50%. ARA raised similar concerns in previous comments submitted in 2016.

Paraquat is a critical component of many conservation tillage programs and it provides an alternative mode of action for managing weeds that have developed resistance to glyphosate. It is very unlikely weeds could develop resistance to paraquat. Many of the new EPA requirements will make it very restrictive to purchase and apply paraquat products. ARA is also concerned with the trend of EPA requiring additional product specific training for certified applicators. If there are specific concerns with the handling and application of pesticide products such as paraquat or dicamba it should be included in the general certified applicator training.

ARA supports the continued access to paraquat without any of the proposed further mitigation measures. ARA believes any additional label changes and commercial applicator restrictions to this product or other product labels should be uniform and consistent with any Restricted Use Pesticides Applicator regulations.

Thank you for your review and consideration of ARA's comments.

Sincerely,

A handwritten signature in black ink that reads "Richard D. Gupton". The signature is written in a cursive style with a large, prominent "R" and "G".

Richard D. Gupton
Senior Vice President, Public Policy & Counsel