



August 5, 2020

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

RE: Docket # EPA-HQ-OPP-2014-0167-0044; Proposed Interim Registration Decision for Clopyralid

Dear Sir or Madam:

On behalf of the Agricultural Retailers Association (ARA), I am writing to provide comments to the U.S. Environmental Protection Agency (EPA) regarding the Proposed Interim Decisions (PID) for clopyralid.

Statement of Interest

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 members employ certified crop advisors (CCAs), qualified agronomy experts who advise farmers on the most up-to-date and effective agronomic practices. CCAs provide advice on proper pest management to avoid development of resistance or alleviate resistance problems to meet the need for improved environmental stewardship.

Comments

Agricultural retailers and their farmer customers rely on clopyralid to control established broadleaf weeds. Clopyralid is a systemic herbicide that internally disrupts weed growth, ultimately resulting in target plant death. Clopyralid has both agricultural and non-agricultural uses. Clopyralid can be used on crops, fallow cropland, pastures and rangeland, forestry, tree plantations, turf (nonresidential), and ornamental grasses in landscapes and nurseries. The herbicide has shown unique selectivity and excellent crop tolerance in all the registered use situations. Clopyralid provides selective control of invasive and pervasive broadleaf weeds in rangeland situations.

ARA's primary concerns with the clopyralid proposed interim decision relate to the notification and labeling requirements. The proposed notification requirement is not practical for the applicator. EPA is proposing applicators to retain a copy of the notification for 2 years. The notification requirement is not practical and can add many additional hours of an applicator's

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day just spending time providing notifications and maintaining notification records associated with this proposal, which could occur multiple times per year.

The next concern is the labeling requirement. The proposed interim decision proposes a label restriction on end-use products containing clopyralid and a holding period for treated plant material instead of a composting prohibition. The proposed label restrictions are unclear, difficult in implementation, and has a lack of relevance when there is not a risk of introduction to a compost system. The requirement would increase the difficulty in disposing of grass clippings and excess manure with the possibility of an additional cost of disposal or storage. There is a possibility of a holding period as an alternative, but no reference of data that is available to identify and appropriate a holding period for treated plant material.

ARA requests EPA provide consistent, predictable, science-driven decisions to mitigate potential risks. Implementing restrictions before all the data is available is premature and has the potential to adversely impact the utility of this chemistry. Thank you for your review and consideration of our comments.

Sincerely,



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