



September 3, 2019

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

**RE: Glyphosate Proposed Interim Registration Review Decision; Docket # EPA-HQ-OPP-2009-0361; FRL-992-96**

Dear Sir or Madam:

On behalf of the Agricultural Retailers Association (ARA), I am writing to provide comments in support of the U.S. Environmental Protection Agency's (EPA) Proposed Interim Registration Review Decision for glyphosate. This important product is one of the most widely used agricultural pesticides in the United States.

### **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.

### **Comments**

On May 6, 2019 EPA released for public comment the proposed interim registration review decision for glyphosate. EPA's draft assessment concludes that glyphosate is not a carcinogenic to humans and found no other meaningful risks when the product is used according to the pesticide label. These findings are consistent with the conclusions of scientific reviews by many other countries as well as the 2017 National Institute of Health Agricultural Health Survey. Comprehensive toxicological and environmental fate studies conducted over the past 40 years have time and again demonstrated the strong safety profile of this important herbicide. Glyphosate use, and its effects have recently come into question. The lawsuit parade started with the release of a monograph from the International Agency for Research on Cancer (IARC) classifying glyphosate as

“probably carcinogenic to humans”, or group 2A in their nomenclature. IARC’s role is to pre-screen compounds for possible carcinogenicity, and if they find something, then action agencies like EPA, PMRA (Canada) and EFSA (EU) would evaluate carcinogenicity in their more in-depth regulatory reviews. In other words, IARC’s result was a “you should evaluate this” message, not a definitive finding. EPA and other agencies have repeatedly reviewed glyphosate and found it to be safe, including this most recent interim decision. The IARC study team also has been criticized for omitting certain research which EPA did review in its regulatory decision.

Glyphosate is one of the most versatile and widely used herbicides in the United States. It is an important tool, not only in agriculture, but also for low-cost weed control along highway, railroad, and utility right-of-way. Homeowners also use glyphosate for cost-effective maintenance of their landscape.

After adopting the use of glyphosate-based herbicides, farmers began to utilize the practice of “conservation tillage”. Previous attempts to utilize conservation tillage often failed due to inadequate weed control. Using conservation tillage allows for less disturbance to the soil and conserves using equipment; thus, this practice is estimated to reduce soil erosion by ninety percent and reduce the carbon footprint by decreasing use of fossil fuels in field preparation. Glyphosate allows farmers to leave crop residue standing, so roots can hold the soil in place while controlling weeds, so the next crop can grow clean.

ARA believes that continued access to this important technology is essential. It is paramount that EPA make any decisions based on actual scientific, peer-reviewed data. A timely regulatory review of this important herbicide is essential in providing predictability to America's agricultural industry.

Thank you for your review and consideration of our comments!

Sincerely,

A handwritten signature in black ink, reading "Richard D. Gupton". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

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