

November 24, 2020

Ana Pinto, Chemical Review Manager
OPP Docket
Environmental Protection Agency Docket Center (EPA/DC)
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket EPA-HQ-OPP-2011-0855-0208

Dear Ms. Pinto:

On behalf of our members, we are writing to request a 90-day extension of comments on EPA's proposed interim decision for paraquat. Collectively, our members include thousands of aerial applicators, growers, retailers, scientists, pesticide registrants and crop consultants that recognize the importance of aerially applied paraquat in controlling weeds and weed resistance.

Paraquat is an important tool in protecting numerous crops from invasive weeds and as a defoliant allowing for a quicker, more efficient yield of numerous U.S. crops. The proposed interim decision would take this tool away from certified aerial applicators and the growers who rely on the product for the above reasons. Because of the importance of aerial applications of paraquat as a harvest aid on cotton, soybean, rice, sunflowers, potatoes and other crops, we respectfully ask for additional time to provide meaningful and substantive comments.

Our need in requesting more time to comment on paraquat is that, aerial applicators are currently busy sowing fields with cover crop seeds to control erosion, retain and recycle soil nutrients, build organic matter to improve soil health, improve water quality and moisture availability, and break disease and insect cycles. They are also busy defoliating in areas where paraquat is used for this purpose and conducting required maintenance on their aircrafts in preparation for winter. In addition, applicators are working to complete the continuing education units (CEUs) that are required for commercial pesticide applicator recertification before the end of the year.

Most importantly, the additional time will allow us to gather additional data about aerially applied acres of paraquat in addition to application rates and other mitigation measures that could achieve the U.S. EPA's risk mitigation goal while still preserving important aerial uses of paraquat. Our initial request for information from our members has indicated that aerial applications of paraquat are also critical for desiccating soybeans, potatoes, sunflowers, and other crops in addition to cotton, but because our members are still working, we need the additional time to get more accurate acreage estimates.

Thank you very much for considering this request for additional time to prepare meaningful comments.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Soybean Association
California Specialty Crops Council
CropLife America
National Agricultural Aviation Association
National Alliance of Independent Crop Consultants (NAICC)
National Association of Wheat Growers
National Cotton Council
National Potato Council
National Sunflower Association
US Dry Bean Council