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Tracy Perry
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Draft Endangered Species Act Biological Evaluations: Atrazine, Simazine, and Propazine Registration Review; Docket # EPA-HQ-OPP-2020-0514-0001

Dear Ms. Perry:

On behalf of the Agricultural Retailers Association (ARA), I am writing to submit comments on the EPA's "Draft Endangered Species Act Biological Evaluations (BE): Atrazine, Simazine, and Propazine Registration Review."

State 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

Atrazine is a widely used herbicide that can be applied before and after planting to control broadleaf and grassy weeds. Atrazine is part of the triazine chemical class, which includes simazine and propazine due to their common mechanism of toxicity. It is primarily used in agriculture with the greatest use on corn, sorghum, and sugarcane. It can also be used on residential lawns and golf courses.

Atrazine is a critical crop protection tool widely used by agricultural retailers and commercial applicators. It is also an important tank mix partner that adds another mode of action to improve effectiveness and performance of other herbicides. The use of these products increases crop yields and enables conservation tillage and no-till farming, helping soil health and reducing soil runoff into rivers and streams. Atrazine has been on the market for over 60 years and one of the most heavily studied and tested crop protection products for safety with thousands of studies from around the world. Atrazine, simazine, and propazine have proven safe to humans and the environment and it is essential that the agricultural community continue to have them available.

EPA should not delegate this important responsibility to the Services, who lack the time and resources to fully evaluate each species and habitat assigned as "likely to be adversely affected" by atrazine.

EPA needs to fully answer all public comments and properly revisit its ecological endpoints determinations provided in the draft BE. It is important to update the agency's approach and endpoints consistent with the previous commitments made to incorporate fully the scientific comments received as well as the most recent and best available data and employ a rigorous quantitative weight of the evidence approach. Afterwards, EPA should then publish an update to the draft BE identifying the new ecological endpoints and ask all stakeholders to review and provide input on the updated ecological endpoints through an adequate public comment period.

EPA should treat species likely to be affected by atrazine as a group, not individuals. It does not make any sense to include already-extinct species as "likely to be adversely affected" by atrazine.

EPA needs to get the science right by making sure high-quality studies carry more weight than low-quality studies in the decision going forward as the agency promised to do. This decision will have a big impact on the everyday usage of atrazine - as well as future reevaluations. If this broken process fails atrazine, it could jeopardize many other key active ingredients and agricultural products in the future.

Atrazine is an important tool for farmers and conservation efforts. This key crop protection tool lacks suitable replacements. The many benefits of atrazine include conservation efforts which improve soil health as well as our climate.

EPA needs to make decisions based on the best available science while considering the impacts on production and prices of agricultural commodities, retail food prices, and other impacts on the agricultural economy. These important tools deserve a regulatory process that includes a comprehensive and accurate scientific review. Pesticide products like atrazine help agricultural retailers and their farmer customers provide climate solutions and promote sustainable agricultural practices that result in a safe, secure, available, and affordable food supply for American consumers.

Thank you for your review and consideration of these comments!

Sincerely,



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