

June 22, 2021

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

RE: Aminopyralid; Docket ID: EPA-HQ-OPP-2013-0749

The Agricultural Retailers Association (ARA) appreciates the opportunity to comment on EPA's renewal of the aminopyralid label and the existing label extension.

Statement of Interest

ARA is a not-for-profit trade association that represents American'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 business or farmer cooperatives to large companies with multiple outlets.

Comments

ARA's members support the safe and ethical use of agricultural chemical products. We write today opposing 1) the termination of existing aminopyralid label extension, and 2) the proposed new notification and record keeping requirements for applicators. Such actions will cause an increase in noxious and invasive plant species, as well as hinder the livestock industry that relies so heavily on pasture grazing. In addition to this, you will be causing a redundant workload on an industry that is already working overtime to put food on the shelves.

Agricultural retailers employ commercial pesticide applicators that receive extensive education and training to apply pesticide products in accordance with the laws and regulations under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). EPA has financially supported the training of certified commercial applicators through state grants. The programs generally cover Best Management Pesticides (BMPs) for safe pesticide use as well as environmental issues such as residual effect and sustainability. Applicators are specially trained through programs like the Professional Applicator Training Course on how to responsibly use chemicals.

Applicators would never suggest a chemical to a grower without making them aware of its environmental and residual effects. Applicators and crop advisors have in-depth conversations to ensure that a product is a good fit for the farmer's operation. On top of that, if a farmer or rancher requests the use of aminopyralid products, they are already aware, or are made aware, of its capabilities and proper use. Requiring a formalized notification system of the compost and

animal bedding and feed restrictions for aminopyralid would add an unnecessary workload to applicators.

Aminopyralid is labeled as a reduced risk pesticide because it has a toxicity and risk level below the market standards. This product is only a threat when it is misused in compost. However, any chemical used outside of its intended purpose and restrictions is a threat. Companies that supply aminopyralid products are already providing educational materials specifically about the product's proper and effective use in forage and manure management. This information is public and already accessible for farmers and ranchers.

Because of this easily accessible information, there has only been one aminopyralid compost-related damage in the U.S throughout the past 10 years. This statistic alone proves that if there is proper management, treated hay poses no meaningful risk for entering the compost feedstock stream. This also proves that the 22 states with the special label extension have clearly not contributed to an increase in aminopyralid-tainted compost. Taking away the special label extension on aminopyralid would have a negative impact on our already fragile food system. Aminopyralid helps prevent the spread of invasive plant species, provides certified weed seed-free hay, allows ranchers to make a profit to increase animal husbandry resources, and gives ranchers a more dependable food source for their livestock.

Aminopyralid's intended purpose is to prevent the growth of noxious or invasive weeds in pastureland. Aminopyralid products allow farmers and ranchers to produce weed seed-free hay that can be sold without worry of spreading an invasive plant species to other habitats and operations. These invasive species can be extremely damaging to agricultural land, especially if they spread to a new operation.

Controlling noxious weeds is essential to maintaining a sustainable habitat that can thrive without the restriction of growth that comes along with invasive plant species. Allowing these invasive species to grow freely in pastureland will ultimately damage grasslands and habitats and contribute even more to the already monumental cost. Most states have gotten rid of their invasive species budgets leaving producers even more vulnerable to unwanted noxious weed infestations.

Weed seed-free certified hay can only be achieved practically by using chemicals like aminopyralid. This certified hay can then be sold without hesitation of negative impacts to help other ranchers in times of unavoidable natural disasters. This additional income can then be used to improve animal living conditions and help improve animal welfare across the country.

Aminopyralid's label extension is a key component in farmers being able to supply crucial hay in times of need. Being allowed to harvest before the Preharvest Interval (PHI) of 180 days allows ranchers and farmers to give their herd a safe and dependable source of food in the occurrence of a drought, flood, heavy snow, wildfires, or etc. Hay requires numerous cuttings and being able to cut before the PHI of 180 days, means that producers can make more cuttings on their hay providing a more robust food supply for livestock.

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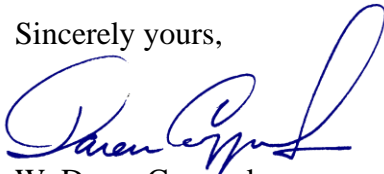
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There is no doubt the getting rid of the special label extension for those 22 states will decrease the availability of certified hay. This will cause an increase in expensive for the rancher to feed their livestock. The consumer will foot the bill for these increased expenses. Lack of certified hay will ultimately lead to higher food costs, reduced sources, and could increase inflation. In conclusion, terminating the special label extension on aminopyralid and requiring additional notification and record keeping will burden the industry by:

- Increasing invasive weed species
- Decreasing the amount of hay available, especially during a natural disaster
- Increased workload for certified applicators
- Decreased amount of certified weed seed-free grass hay
- Decrease in hay production that could interfere with supply chain and availability for end-consumers and higher prices

Thank you for review and consideration of our comments.

Sincerely yours,



W. Daren Coppock
President & CEO