



July 29, 2022

Elissa Reaves
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

RE: Pesticide Registration Review: Atrazine; Proposed Revisions to the Interim Registration Review Decision Memorandum; Docket# EPA-HQ-OPP-2013-0266

Dear Dr. Reaves:

On behalf of the Agricultural Retailers Association (ARA), I am requesting a 60-day comment extension to the comment period for the Environmental Protection Agency's (EPA) proposed revisions to the interim registration review decision memorandum on atrazine.

ARA is a 501(c)(6) non-profit trade association that represents the interests of agricultural retailers and distributors across the United States on legislative and regulatory issues. As the political voice for agricultural retailers and distributors, ARA advocates on critical issues, educates legislators and collaborates with regulatory officials on critical issues affecting the industry. Ag retailers supply farmers and ranchers with products and services. These products include seed, nutrients, crop protection products, feed, equipment, and technology. Retailers also provide consultative services such as crop scouting, soil testing, field mapping, custom planting and application and development of nutrient management and conservation plans. Certified Crop Advisers (CCAs) and Pest Control Advisers (PCAs) are often retained on the retailer's staff to provide professional guidance and crop input recommendations to farmers and consumers. Agricultural retailers range in size from small, family-held businesses to large companies and farmer-owned cooperatives with many outlet stores. Large and small retail facilities are scattered throughout all fifty states and provide critical goods and services, as well as jobs and economic opportunities in rural and suburban communities.

The proposed changes to the interim registration review are highly complex and technical, requiring substantially more time to review the full impact these proposed changes will have on agricultural retailers, their farmer customers and commercial pesticide applicators. ARA does not believe the current comment period provides adequate time for all stakeholders to formulate comments and provide substantive feedback to EPA. ARA recommends EPA extend the comment period up to an additional 60 days to maximize thoughtful discussion and input from impacted agribusinesses.

Thank you for your review and consideration of our comments.

Sincerely,

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