



October 7, 2022

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

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

The Agricultural Retailers Association (ARA) appreciates the opportunity to comment on EPA's proposed revisions to the interim registration review decision memorandum for atrazine.

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

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. It appears the EPA is using incorrect data and methodological errors in the interim registration review decision.

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. Atrazine is one of the most heavily studied and tested crop protection products for safety with over 7,000 studies from around the world. This important pesticide product has proven safe to humans and the environment, and it is essential that the agricultural community continue to have it available for use with existing label requirements.

The agency's proposed level of concern (LOC) is far below the current level and would adversely impact the effective use of atrazine by commercial applicators and farmers. Since its initial use, atrazine has been safely and effectively used by our industry and allowed for the increase of conservation tillage, which is key to carbon-smart agricultural practices. These practices help protect the soil from water and wind erosion, conserving moisture, reducing run-off, and improving wildlife habitat. If the current EPA proposal is adopted, over 72 percent of U.S. corn acres would be out of compliance based on a flawed model used to predict which areas would exceed the new atrazine strict limits. Areas predicted to exceed the limit would then be required to implement and document one or more mitigation practices from a "picklist" and use a lower rate of atrazine.

None of the proposed changes is based on credible science. All the data collected over the past several decades continues to show atrazine is safe to use at the current LOC at 15 ppb. There is also no reason to ban the aerial application of this product. ARA supports comments being submitted by the National Agricultural Aviation Association related to the importance of maintaining aerial application as part of the EPA FIFRA approved label.

When farmers use atrazine, our nation can grow more corn, sorghum, sugarcane, and other crops, while using fewer additional pesticides. If this proposal is adopted, it would result in the industry being required to use more inputs and cause the industry to take a step backward from successful sustainable agricultural practices. Placing severe limits on atrazine will also have broad implications considering it is a key component in over 90 herbicide mixtures our industry relies upon. Atrazine has been on the market for over 60 years and no other pesticide product has been studied more or has a longer safety record. ARA urges EPA to continue to follow the peer-reviewed research and support for the existing LOC ppb as currently being safely used by the industry.

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.

Thank you for your review and consideration of our comments.

Sincerely,



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