



October 3, 2016

Steven Knott, Designated Federal Official
Office of Science Coordination and Policy
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460-0001
Docket: EPA-HQ-OPP-2016-0385

RE: Docket # EPA-HQ-OPP-2016-0385; FIFRA Scientific Advisory Panel; Notice of Public Meeting

Dear Mr. Knott:

On behalf of the Agricultural Retailers Association (ARA), we'd like to submit a comment for the consideration of the Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel (FIFRA SAP) assembled by the Environmental Protection Agency (EPA) to evaluate the carcinogenic potential of glyphosate on October 18-21, 2016.

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

ARA is well familiar with glyphosate and the way in which it has transformed modern agriculture by delivering direct benefits to farmers and improving sustainability for the entire industry. We have been eagerly awaiting the re-registration of glyphosate as part of the routine review by the EPA. ARA believes it is paramount that the Agency's review of glyphosate is conducted in a science-based and transparent fashion and is not influenced by activist agendas. While we are concerned that the SAP process may cause further delays, we also hope that it delivers a timely and balanced review of glyphosate.



As one of the most studied herbicides on the market, glyphosate has a long history of safe use. Experts worldwide have repeatedly concluded that when used according to label directions, glyphosate does not present an unreasonable risk of adverse effects to humans, wildlife and the environment. Last year, EPA's 2015 Cancer Assessment Review Committee (CARC) report classified glyphosate as "not likely to be carcinogenic to humans, which is EPA's most favorable classification. And, most recently, the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) reached the conclusion that "glyphosate is unlikely to pose a carcinogenic risk to humans from exposure through diet."

Since their introduction to the market in 1974, glyphosate-based products have brought extensive economic and environmental benefits to farmers. A timely regulatory review of this essential herbicide is essential in providing predictability to the agriculture community. The advantages of glyphosate-tolerant cropping systems are well documented. The benefits of glyphosate also extend into cropping systems that don't include glyphosate-tolerant crops by reducing the need for mechanical weed control and overall weed management costs. Outside of agriculture, glyphosate is a key tool for controlling weeds along highways and right-of-ways

Thank you for your review and consideration of this important matter.

Sincerely,

A handwritten signature in black ink that reads 'Richard D. Gupton'. The signature is written in a cursive, flowing style.

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