



April 30, 2018

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-0001

RE: Glyphosate Registration Review; Docket # EPA-HQ-OPP-2009-0361

Dear Sir or Madam:

On behalf of the Agricultural Retailers Association (ARA), I am writing to provide comments on the draft human and ecological risk assessments for glyphosate. This important product is one of the most widely used agricultural pesticides in the United States.

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

On December 18, 2017, the released for public comment the draft risk assessments for glyphosate. EPA's draft assessment concludes that glyphosate is not likely to be carcinogenic to humans and found no other meaningful risks when the product is used according to the pesticide label. These findings are consistent with the conclusions of science reviews by many other countries as well as the 2017 National Institute of Health Agricultural Health Survey. Comprehensive toxicological and environmental fate studies conducted over the past 40 years have time and again demonstrated the strong safety profile of this important herbicide.

Glyphosate is one of the most versatile and widely used herbicides in the United States. It is an important tool, not only in agriculture, but also for low-cost weed control along highway, railroad, and utility right-of-way. Homeowners also use glyphosate for cost-effective maintenance of their landscape.

Maintaining access to glyphosate will promote environmental and economic sustainability in agriculture. With the adoption of glyphosate-based herbicides, farmers began to adopt a practice called "conservation tillage." Farmers can disturb less soil and drive their equipment less using conservation tillage practices, resulting in a reduction of soil erosion and carbon emissions. It is

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estimated that conservation tillage can reduce soil erosion by up to 90 percent. For this conservation practice to be successful it must be paired with effective weed control. Glyphosate allows farmers to leave crop residue standing, so roots can hold the soil in place while controlling weeds and the next crop can grow clean.

ARA believes that continued access to this important technology is essential. It is paramount that EPA make any decisions based on actual scientific, peer-reviewed data. A timely regulatory review of this important herbicide is essential in providing predictability to America's agricultural industry.

Thank you for your review and consideration of our comments!

Sincerely,

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

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