



October 5, 2016

OPP Docket

Environmental Protection Agency Docket Center, (28221T)

1200 Pennsylvania Avenue, N.W.

Washington, D.C. 20460-0001

RE: ATRAZINE, SIMAZINE, AND PROPAZINE DRAFT ECOLOGICAL RISK ASSESSMENT; EPA-HQ-OPP-2013-0266

On behalf of the Agricultural Retailers Association (ARA), I am writing to submit comments on the EPA's "Draft Ecological Risk Assessments: Atrazine, Simazine, and Propazine Registration Review."

State 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 draft ecological risk assessments. We are concerned that EPA draft ecological risk assessment includes studies its own Scientific Advisory Panel (SAP) deemed as flawed and does not incorporate new



studies. In addition, the conclusions include scientific errors and flawed interpretations that are inconsistent with previous EPA conclusions and assessments by similar regulatory agencies from other countries. ARA urges EPA to correct these errors to ensure the agency uses the best science and data available, which is the cornerstone of this important regulatory process.

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. The use of these products increases crop yields and enables conservation tillage and no-till farming, helping soil health and to reducing soil runoff into rivers and streams. EPA previously estimated that farming without a product such as atrazine would cost corn growers around \$28 per acre with reduced yields. Atrazine has been on the market for over 50 years and one of the most heavily studied and tested crop protection product for safety with over 7,000 studies from around the world. Atrazine, simazine, and propazine have proven safe to humans and the environment and it is essential that the agricultural community continue to have them available.

EPA needs to make decisions based on the best available science while taking into account 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.

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