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August 23, 2017

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

RE: Docket # EPA-HQ-OPP-2009-0846-0081; Registration Review Case – Diquat Dibromide, No. 0288

On behalf of the Agricultural Retailers Association (ARA), I submit the following comments regarding the U.S. Environmental Protection Agency's (EPA) registration review process for Diquat Dibromide (Diquat), an active ingredient in several registered herbicide products.

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.

Diquat: An Important Active Ingredient for Herbicides

Thank you for proposing an interim registration for diquat to ensure its continued availability and use for America's agricultural industry. ARA is concerned with the following proposed label changes:

- Reduction in current application rates
- Requiring the use of personal protective equipment
- Closed system required for mixer / loaders supporting subsurface applications

ARA members provide essential commercial ground and aerial pesticide application services for their farmer customers. Diquat herbicide products have been utilized as an important fast-acting non-selective weed control for the past 50 years. It remains a critical tool for controlling species like Hydrilla, Giant Salvinia, Milfoils, Water Lettuce, Water Hyacinth, Curlyleaf Pondweed and Duckweed in ponds, lakes, and other listed aquatic sites. Diquat provides a unique mode of action critical for developing sound herbicide weed management programs. Crops that benefit the most from these products include potatoes, canola, alfalfa and clover seed production. It is also a great tank mix partner for other modes of action herbicides. In addition, the low volatility help minimize potential off-target drift from the target application site.

With the ever-changing weed and pest control challenges facing the nation's agricultural industry, it is essential that commercial applicators and their farmer customers can use products such as Diquat that have a proven track record as an effective herbicide against invasive weeds while protecting human and ecological health. Placing undue and unnecessary application restrictions or prohibitions on the use of the product may result in larger weed control problems currently faced by industry.

Conclusion

Diquat is a reliable and important tool for sound herbicide resistant weed management programs. To our knowledge, it is also proven safe to humans and the environment and it is essential that the agricultural community continue to have it available for use as an important crop protection tool. ARA members and their farmer customers have safely used Diquat herbicides for years and support the continued use of this product under similar registration guidelines.

Thank you for your review and consideration of these comments!

Sincerely,



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