



1156 15<sup>TH</sup> Street, NW · Suite 500 · Washington, DC 20005  
T 202.457.0825 · F 202.457.0864 · [www.aradc.org](http://www.aradc.org)

November 24, 2015

United States Environmental Protection Agency  
Ariel Rios Building, Mail Code: 7508P  
1200 Pennsylvania Avenue, N. W.  
Washington, DC 20460

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

On behalf of the Agricultural Retailers Association (ARA), I submit the following comments in regards to 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**

It is our understanding that on September 25, 2015 the EPA published draft risk assessments for Diquat and indicated that several changes in the current use patterns for the product may be required to support the continuing registration. Potential label changes identified include:

- Reduction in current application rates;
- Limiting the number of allowed applications per year and / or the time between applications;
- Restricting applications to fall and winter months;
- Restricting or prohibiting aerial applications;
- Adding buffers from the application site to non-targets sites; and
- Requiring certain nozzle characteristics.

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 many major weeds like Palmer amaranth, horseweed, giant ragweed, kochia, cocklebur, morningglory, and waterhemp. It 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 for commercial applicators and their farmer customers maintain essential tools such as Diquat that 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. We believe EPA should continue the registration for this active ingredient using the best available peer-reviewed science while taking into account the impacts on production and prices of agricultural commodities, retail food prices, and otherwise on the agricultural economy. 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 our comments!

Sincerely,



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