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April 6, 2015

**VIA Electronic Mail**

Office of Pesticide Programs Docket  
U.S. Environmental Protection Agency  
Mailcode 28221T  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460-0001

**RE: Docket ID # EPA-HQ-OPP-2014-0355; Registration for the New Active Ingredient Bicyclopyrone**

On behalf of the Agricultural Retailers Association (ARA), I submit the following comments regarding the EPA's review of the new active ingredient bicyclopyrone, for use as an herbicide on corn.

**Statement of Interest**

ARA is a not-for-profit trade association that represents the nation'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.

**Bicyclopyrone: New Active Ingredient in Acuron Herbicide**

Bicyclopyrone is an important new herbicide for control of problem weeds in field corn, sweet corn, and yellow popcorn. This product would provide a helpful tool ARA's agricultural retail members can utilize in their custom application business as a pre-emergence application. This new active ingredient will be one of a four active ingredient, three mode of action product called *Acuron* that will also contain mesotrione, atrazine, and S-metolachlor. With three modes of action, *Acuron* will have a built in component to control and decrease populations of glyphosate resistant giant ragweed, waterhemp, pigweed species, and others. It is critical to have very effective pre-emergence weed control products to ensure a reduced likelihood of resistance to other classes of agricultural chemistry. Given the history the agricultural industry has faced addressing atrazine run-off in sensitive watershed areas, the use of this new product will be a valuable tool that will help the environment and protection of crops.

Thank you for your review and consideration of our comments! We encourage EPA to expedite the review of this product to allow its availability for the 2015 crop season.

Sincerely,

Richard Gupton  
Sr. Vice President, Public Policy & Counsel