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October 4, 2022

Submitted via www.regulations.gov

Dr. Elissa Reaves
Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1201 Constitution Ave NW
Washington, DC 20004

RE: EPA Proposed Revisions to the Atrazine Interim Registration Review Decision
EPA-HQ-OPP-2013-0266-1627 (previously EPA-HQ-OPP-2013-0266)

American Agri-Women, the nation's largest coalition of women in farming, ranching and agribusiness with members in 42 states, appreciates the opportunity to comment on EPA's "Proposed Revisions to the Atrazine Interim Registration Review Decision, Case Number 0062" that would have negative consequences on sweet corn, sugar cane, field corn and sorghum production.

American Agri-Women (AAW) oppose efforts by the USEPA to require additional mitigation strategies of farmers who rely on atrazine as part of their management toolkit. Atrazine is an affordable ingredient in more than 300 products that are used mostly for agricultural uses and some for residential uses. The majority of these products are pre-mixes used to manage weed resistance.

Atrazine has proven itself to be effective at weed control with minimal impacts on the environment or human health over more than five decades of use. It is our understanding that agency scientific advisory panels have reaffirmed on at least two occasions that additional mitigation for aquatic plant communities is not necessary.

If the Agency persists in not heeding the recommendations of the independent scientific advisory panels by lowering the level of concern down to 3.4 parts per billion over a 60-day average, we are convinced the resulting mandated mitigation strategies will impact costs and timing of food production that ultimately impact consumers.

Considering that more than 70% of corn acres in the United States would be required to apply additional mitigation strategies, it's nearly impossible to calculate the added costs related to converting cropland to buffer strips, lost growing days due to rigid windows for product application, or the requirement of applying cover crops and the resulting delays they can cause for spring planting plus the challenges of paying for and acquiring additional inputs (i.e. seed, aerial or other in-season seeding techniques).

We respectfully request the agency desist in pursuing its current proposal related to atrazine.

Sincerely,


Heather Hampton-Knodle, President
American-Agri-Women

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