

October 3, 2022

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

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

Dear Dr. Reaves:

The Iowa Department of Agriculture and Land Stewardship appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) Proposed Revisions to the Atrazine Interim Registration Review Decision. I submit these comments from the perspective of Iowa farmers and the Iowa agriculture community, and as a partner with EPA in the regulation of pesticide use in the State of Iowa.

Atrazine is a critical weed management tool for Iowa farmers and is used on more than 70 percent of corn acres. Efforts to further restrict the use of atrazine will have a negative impact on food production, the environment, and the farm economy. The proposed level of concern far below the current level will diminish the herbicide's effectiveness, leaving farmers with fewer options to control weeds and implement conservation practices.

Further restricting the use of atrazine will negatively impact pest resistance management, integrated pest management (IPM), and conservation.

As EPA is acutely aware, weeds can evolve and develop tolerance to some of the most effective herbicides, leading to lower yields and higher costs. EPA estimates the cost to replace atrazine is \$42 per acre from alternative herbicide expenses and reduced yields from poor pest control. Iowa farmers regularly combat difficult to control weeds, including waterhemp, palmer amaranth and other varieties of pigweed.

The Iowa Pest Resistance Management Program was formed as a grassroots, collaborative effort to protect Iowa crops from costly pest resistance that threatens food production and our state's economy. The reduced rate of atrazine and removal of a pre-emergent application option is contrary to weed resistance management practices, notably timing applications to target weeds at an earlier stage of development. Post-emergent weeds will be more difficult to manage with only later pesticide treatments and lower application rates. Research on pest resistance has repeatedly shown this can increase the onset of resistance in pest populations. Further restricting the use of

atrazine will have a negative impact on the efforts of farmers, landowners, agronomists, scientists, and businesses to preserve management tools and prevent pest resistance.

For decades, atrazine has enabled the increased adoption of no-till and conservation tillage in Iowa and many other states. EPA leaders heard first-hand from Iowa farmers at the 2022 Iowa State Fair who implemented no-till conservation practices on their farms 20 to 30 years ago and are concerned about their ability to continue these practices if EPA further restricts their access to pesticides that are critical to their ability to effectively manage weeds.

Conservation tillage is key to climate-smart agriculture and improves water quality and soil health, prevents soil erosion, and improves wildlife habitat. Farmers who implement these conservation practices depend on herbicides like atrazine for effective weed control. If adopted, EPA's proposed atrazine regulations will have significant implications on no-till and conservation tillage, representing a significant step backwards in conservation and negatively impacting efforts to reduce carbon emissions.

EPA must reconsider its extremely restrictive CE-LOC of 3.4 ppb and return to the previous LOC.

The September 2020 decision by EPA to set the atrazine aquatic level of concern (CE-LOC) at 15 parts per billion (ppb) resulted from years of scientific review. The scientific consensus is that the current aquatic ecosystem tolerance level is safe and there is no scientific reason to change the published 15 ppb level of concern. More than 7,000 studies over 60 years have consistently proven the safety of atrazine. EPA must support the 15 ppb as published and adopt a level of concern that is supported by scientific research and does not inhibit the effective use of this critical weed management tool.

The proposed picklist approach to managing atrazine is not workable for Iowa farmers and creates enforcement challenges for state pesticide regulatory agencies.

The EPA proposed picklist approach is complicated, costly, and not feasible for Iowa farmers, landowners, and pesticide applicators. Pesticide applicators will need training on how to interpret the complex picklist options, atrazine regions, and how to adopt the "engineering and agronomic practices that reduce runoff" in the proposed requirements. State pesticide regulatory agencies do not have technical resources available to answer questions from applicators about the revised label and enforcement about soil type and region, land management/conservation practices, engineering practices, and at what level of the picklist they must follow to comply with label requirements.

Several of the picklist items are practices controlled by the landowner or farmer, not the pesticide applicator. EPA indicates in the June 2022 proposed revisions to the atrazine interim registration review decision that growers will have flexibility with the picklist. However, in many cases of crop production, the grower is not the applicator. This disconnect with the label being the only mechanism for dissemination of atrazine use requirements that are directly dependent on land management practices complicates implementation and raises new questions about record-keeping and enforcement responsibility of the proposed mitigation measures.

More specifically, the proposed record-keeping requirements extend beyond those specifically required by regulation and topics covered in state pesticide certification programs. EPA's June 2022 proposed revision is lacking consideration of the cost of applicator training resources, practices for effective implementation of the record-keeping requirements (coordinated by the grower, landowner, applicator, etc.), and the assessment of an applicator's overall ability to meet these new compliance standards.

The EPA June 2022 proposed revisions also don't fully address the additional costs farmers and landowners will bear to implement picklist items such as cover crops, buffer strips, terraces, waterways, etc. All of these can be helpful conservation practices, but should remain voluntary and must not be unfunded mandates arbitrarily determined by pesticide regulatory officials.

Additionally, by removing the pre-emergent application and reducing the rate of atrazine, EPA acknowledged this will complicate herbicide resistance management, and proposes the atrazine rate reduction to be less feasible in the southern U.S, allowing higher rates in southern field corn. EPA should reconsider feasibility of the rate reduction for ALL herbicide resistant weed populations in the U.S., including those in the Midwest, alongside the benefits to herbicide resistance management programs and overall crop production.

Before any part of this proposed rule is finalized, EPA must convene a Scientific Advisory Panel.

EPA must adopt a level of concern for atrazine that does not impair the effective use of this critical weed management tool and is based on the best available science. I urge EPA to follow the peer-reviewed research and support the 15 ppb as published. However, if EPA moves forward with any new atrazine restrictions or any part of this proposed rule, it must follow federal law requiring science-based decisions and first conduct a Scientific Advisory Panel to review the scientific evidence in this matter.

Thank you for the opportunity to submit written comments on this important issue.

Respectfully submitted,



Mike Naig
Iowa Secretary of Agriculture