



*Submitted via Federal eRulemaking Portal*

October 5, 2016

EPA Office of Pesticide Programs (OPP) Docket  
EPA Docket Center 28221T  
1200 Pennsylvania Ave, NW  
Washington, DC 20460-0001

Re: **Docket ID No: EPA-HQ-OPP-2015-0794 (Draft Ecological Risk Assessments: Atrazine, Simazine, and Propazine Registration Review)**

The National Association of State Departments of Agriculture (NASDA) submits the following comments on the U.S. Environmental Protection Agency's (EPA) proposed Draft Ecological Risk Assessments: Atrazine, Simazine, and Propazine Registration Review (docket number EPA-HQ-OPP-2015-0794).

## **I. About NASDA**

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities. Conservation and environmental protection are also among our chief responsibilities.

In forty-three states, the state department of agriculture is a co-regulator with EPA and responsible for administering, implementing and enforcing the production, labeling, distribution, sale, use and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

## **II. General Comments**

Crop protection tools are an important component within many agricultural crop production systems, and FIFRA establishes a rigorous, scientific evaluation and review process for these tools. NASDA supports the scientifically-sound development, review, registration, and re-registration of crop protection technologies and uses to enable growers to produce our nation's food, fiber, and fuel.

Atrazine is one of the most closely examined pesticides in the world and has a long history of safe and effective use. More than 400,000 U.S. corn, sorghum and sugar cane growers depend on this essential crop protection tool, which is one of the most scrutinized and examined pesticides in the world. Atrazine's safety has been established in nearly 7,000 scientific studies over the past fifty years. This important tool deserves a scientific process that includes the best available data and a thorough and comprehensive scientific review.

NASDA has significant concerns with EPA's draft ecological risk assessments for atrazine, simazine, and propazine, which departs from the Agency's obligations under FIFRA, and NASDA is equally concerned with the Agency's justification, or lack thereof, for utilizing studies deemed flawed by EPA's 2012

Scientific Advisory Panel (SAP). NASDA identified this concern and requested EPA address several questions related to the development and pre-release of the preliminary risk assessment in our letter to the EPA Administrator on May 27, 2016. NASDA looks forward to the Agency's response to those specific issues.

EPA's apparent lack of compliance with its obligations under FIFRA has potential impacts beyond undermining the public confidence in the Agency's science-based regulatory mission and directly impacts U.S. agricultural producers. NASDA recommends EPA incorporate the extensive scientific authorities, presented through the Agency's own SAP, to revise and correct the over-estimated assumptions utilized in this draft ecological assessment in order to execute a regulatory compliant and transparent review of scientifically sound data.

### **III. Conclusion**

Growers face constant pressures ranging from weather conditions, pest stressors, resistance issues, and myriad of other challenges. It is essential to American agriculture that EPA execute its authorities and responsibilities in a timely manner consistent with the Agency's robust science-based registration and review process to ensure farmers have access to a broad range of new technologies and modern crop protection tools to continue to produce our nation's food, fiber, and fuel.

As regulatory partners with EPA, NASDA stands ready to assist EPA in ensuring our growers have access to a broad range of technologies and crop protection tools, reviewed and approved in a scientifically-sound and transparent manner, needed to continue to produce our nation's food, fiber, and fuel.

NASDA appreciates the opportunity to comment on this important issue. Please contact Dudley Hoskins ([dudley@nasda.org](mailto:dudley@nasda.org)) if you have any questions or would like any additional information.

Sincerely,



**Barbara P. Glenn, Ph.D.**

*Chief Executive Officer*

NASDA