



NEW YORK CORN & SOYBEAN GROWERS ASSOCIATION



August 3, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
Executive Chamber
New York State Capitol
Albany, NY 12224

Re: S.6502-A/732-B

Dear Governor Cuomo:

On behalf of New York State’s agricultural and forestry organizations, we would like to strongly urge you to veto the above-referenced legislation. If enacted into law, this bill would prohibit the use of Glyphosate on state property. Glyphosate is a widely-used herbicide to control the growth of noxious weeds, grasses, and unwanted forest underbrush. Not only is Glyphosate critical for farmers growing fruit, vegetables, corn, soybeans, and other food crops, it is an important tool of the state to control invasive plants on state lands. Further, this bill would set a bad precedent allowing a legislative body, rather than the state agency in charge of regulating the chemical, to make a decision on its appropriate use.

Our strongest concern regarding this legislation is that there are several farms that lease land from the state to grow crops, and this bill will prohibit farmers from using this important crop protectant to control weeds that can choke out their crop. These farmers, like their neighbors, should be able to have access to this duly-registered pesticide. Additionally, many of New York’s agricultural colleges which operate on state-owned land, like Cornell College of Agriculture and Life Sciences (CALs), SUNY Morrisville and SUNY Cobleskill, also should have continued access to this product to conduct research, grow crops for their livestock, and utilize the product for hands-on learning experiences. We estimate that at least 5,000 acres of state-owned lands are farmed by commercial farmers or state colleges. In addition to agriculture, this bill would also impact forest health, as Glyphosate is used to control tree shoots from stumps that crowd out other desired tree growth.

New York's forests have more invasive plants, pests, and diseases than any other state, and the impact of overbrowsing by deer throughout much of the state further exacerbates the problems of forest regeneration. Our forests are under assault and our forest land managers, including those who manage 750,000 acres of state reforestation areas and nearly four million acres of Forest Preserve, are using every possible tool to address these invasive species and the impacts they are having on forest health. No entity uses chemicals in forests lightly as they are expensive and there is an economic as well as ethical responsibility to use natural biologic controls to combat invasive forest plants, pests, and diseases whenever possible. Regrettably, often there is no other recourse and more holistic and natural courses have been rendered useless due to the magnitude of the problem. Failure to intervene with sustainable forest practices, including herbicides, will yield a generation of forests on private as well as public lands which will be less productive and biologically diverse than the forests we have today.

Lastly, we all know the impact that invasive species have had on our lands and forests. Farmers see it firsthand on their properties and forest owners and managers see the impact on forest health and regeneration due to a myriad of invasive plants. With the warming climate, more invasive species have been able to flourish in our forests and fields. We believe it is imperative that Glyphosate remain on the list of tools that the state has to combat this ever-growing list of plants and protect our native flora and fauna.

Glyphosate has been registered with the Environmental Protection Agency (EPA) since 1974 and has since been reviewed and reassessed within the EPA's registration review program. The EPA has found no risks when Glyphosate is used properly with its current label. Most states accept the EPA review and registration for allowed use in their states; however, New York is one of the few states that reviews products for environmental and health impact prior to registration in the state, creating a dual certification process.

Glyphosate has been used in agricultural production for more than 40 years. During this timeframe, it has proven itself as an environmentally-friendlier weed control agent than some of the alternative products that Glyphosate replaced. When it comes to safety assessments, no other pesticide has been more extensively tested than Glyphosate, with more than 800 safety studies submitted to regulators. The 2018 Agricultural Health Study, the largest epidemiologic study on Glyphosate-based herbicides supported by the U.S. National Cancer Institute, followed over 50,000 licensed pesticide applicators for 20 years (1997-2017) and found no associations between Glyphosate use and cancer risk.

It is important for the agriculture and forest industries to access the tools they need to continue to provide food, fiber, and timber for all New Yorkers. For these reasons we strongly urge you to veto this legislation. Thank you for your time and consideration of these comments.

Sincerely,

Empire State Forest Products Association
New York Apple Association
New York Corn & Soybean Growers Association
New York Farm Bureau
New York Wine Industry Association
New York State Agribusiness Association
New York State Turfgrass Association
New York State Vegetable Growers Association
New York State Wine Grape Growers
Northeast Agribusiness & Feed Alliance
Northeast Dairy Producers Association.

cc: Basil Seggos, Commissioner, NYS Department of Environmental Conservation
Richard Ball, Commissioner, NYS Department of Agriculture & Markets