



Kansas Grain and Feed Association
Kansas Agribusiness Retailers Association

February 13, 2021

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460-0001

Submitted via Federal Rulemaking Portal: *www.regulations.gov*.

Re: Docket ID No. EPA-HQ-OPP-2020-0514. Draft Endangered Species Act
Biological Evaluations on atrazine, simazine, and propazine, published in Federal
Register, 85 FR 71071.

On November 6, 2020, the United States Environmental Protection Agency (EPA) issued a notice, for public review and comment, of its draft nationwide biological evaluations for the registration review of atrazine, simazine, and propazine relative to the potential effects on threatened and endangered species and their designated critical habitats (draft evaluations).

The Kansas Grain and Feed Association and Kansas Agribusiness Retailers Association submit these comments, jointly, on the draft evaluations.

The Kansas Agribusiness Retailers Association (KARA) is a voluntary trade association whose membership includes over 700 agribusiness firms that are primarily retail facilities supplying fertilizers, crop protection chemicals, commercial application services and seed to Kansas farmers. KARA serves as a representative voice for the agribusiness industry.

The Kansas Grain and Feed Association (KGFA) is a voluntary state association with a membership encompassing the entire spectrum of the grain receiving, storage, processing and shipping industry in Kansas. KGFA's membership includes over 950 Kansas business locations and represents 99% of the commercially licensed grain storage in the state.

EPA has indicated that it is extending the comment period on the draft evaluations due, in part, to the large number of stakeholders potentially impacted by the draft biological evaluations. As participants in the production agriculture industry, our members would be directly affected by the draft biological evaluations.

Regulatory actions affecting the sale of agricultural chemicals utilized in grain production, such as atrazine, affect our members' ability to serve Kansas farmers. For that reason, we offer the following comments on the draft evaluations.

Atrazine's Strong Record of Safe Use

Atrazine remains one of the most extensively studied, reviewed and regulated agricultural products in the world. It has a proven track record of more than 60 years of safe and effective use in agricultural crop production.

Vigorous scientific studies and data confirm that atrazine is used without unreasonable risks to human health or the environment. In fact, EPA has close to 7,000 studies of atrazine on file. By comparison, most herbicide products are run through around 200 studies before being registered as safe for use.

The draft human health risk assessment updates more than a decade of scientifically comprehensive reviews that acknowledge atrazine's safety when used according to the label. Atrazine was also confirmed safe for use by international standards. The World Health Organization approved for use in 2003, and the United Nations Food and Agriculture Organization approved for use in 2007. Further, Great Britain (2000), Canada (2004) and Australia (2008) have all confirmed atrazine as safe for use.

Benefits of Atrazine in Kansas Agricultural Production

Kansas is a leading agricultural producer in agricultural commodities, including grain sorghum and corn. Corn and grain sorghum production support the grain handling, livestock, and ethanol industries in Kansas. All these industries are dependent on the use of agricultural crop protection products, such as Atrazine, simazine and propazine.

Atrazine is widely used in at least 70 pre-emergence herbicide tank mix formulations which broaden the spectrum of weed species control, weed resistance management, and residual control. It is one of the best weed control tools available. It is especially beneficial in controlling herbicide resistance in weeds.

While atrazine applied post-emergence is safe for use on grain sorghum and other crops, many other post-emergent herbicides can cause leaf burn and stunting, increase lodging or cause stalks to become brittle, all of which can reduce yield. In addition, university field trials have found that using atrazine to control weeds can increase yields by nearly 6 bushels an acre.

Atrazine is one of the few products available that is both safe and effective for use both as a pre-emergent and post-emergent herbicide. In addition, atrazine is not at risk of volatilizing when applied when air temperatures increase, which greatly reduces the potential for drift or volatilization onto neighboring crops or other vegetation.

Environmental Benefits of Atrazine

Herbicides like atrazine have allowed Kansas producers to adopt conservation tillage methods which reduce wind and water erosion of our precious topsoil, diminish soil compaction, preserve soil moisture, and reduce energy usage by limiting the number of

times tractors and equipment traverse farm ground. In a state like Kansas, where drought conditions often persist, preserving moisture levels is critical.

Much of the Kansas cropland is irrigated ground. Significant research is currently focused on technologies and production strategies that reduce the use of ground water, including non-tillage practices. Proven crop protection products like atrazine are an integral component to this process.

Controlling weed growth in fields through the use of herbicides helps to ensure that crops, not weeds, are making use of the available water and nutrients in the soil. This allows the plant to maximize yield potential, optimizing overall production efficiency and a decreased need for water and fertilizers. Atrazine, simazine and propazine are critical products for controlling weeds, enabling no-till farming, and managing weed resistance issues.

Atrazine's properties also allow for good soil residual, which often gives season-long control of many broadleaf weeds with a single application. For this reason, the use of atrazine frequently reduces the need for either a follow-up herbicide application, or the need for application of other, potentially less safe, alternative herbicides. Those alternative herbicides typically require a second application, which may be less safe for both the target crop and other surrounding crops.

Economic Benefits of Atrazine

Atrazine is one of the most affordable weed control options for Kansas farmers. The entire agricultural industry would suffer harm from the loss of atrazine as a crop protection option. In fact, a University of Chicago study found that the loss of atrazine could cost farmers as much as \$59 per acre. Farmers typically apply atrazine at a cost below \$7.50 per acre, as compared to alternative pre-emergent herbicides which cost closer to \$22.00 per acre.

Summary

Atrazine, simazine, and propazine herbicides serve as an important part of modern production agriculture. The ability to use these safe and reliable crop input products, at agronomically sound rates, has far reaching implications on the overall grain production, handling, and processing industries. For that reason, we would request that this safe and effective crop protection product continue to be made available to Kansas farmers.

Thank you for the opportunity to submit these comments and recommendations.

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