



August 2, 2023

Submitted electronically via regulations.gov

Ms. Michal Freedhoff
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

RE: Illinois Farm Bureau Comments Regarding the Examination of
Microcosm/Mesocosm Studies for Evaluating the Effects of Atrazine on Aquatic
Plant Communities
Docket No. EPA-HQ-OPP-2023-0154; FRL-10803-02-OCSP

Dear Ms. Freedhoff:

The Illinois Farm Bureau® (“IFB”) appreciates this opportunity to support to the United States Environmental Protection Agency (“USEPA” or “Agency”) further review and reevaluation of eleven (11) atrazine microcosm and mecocosm (“cosm”) studies identified by the 2012 Federal Insecticide, Fungicide and Rodenticide (FIFRA) Scientific Advisory Panel (SAP). IFB is a member of the American Farm Bureau Federation® (“AFBF”), a national organization of farmers and ranchers. Founded in 1916, IFB is a non-profit, membership organization directed by farmers who join through their county Farm Bureau (“CFBs”). IFB has a voting membership of more than 74,000.

Illinois farmers have used atrazine for 50 years, relying on the fact that it is one of the most studied herbicides in history. Illinois farmers, as well as farmers in 60 countries around the world, use atrazine to produce safe, abundant and affordable crops. In 2003, USEPA estimated that growers would lose an estimated \$28 per acre without atrazine. This is a significant cost that would be borne by Illinois farmers when no cost-effective alternatives exist.

The atrazine issue is a critical one for IFB farmer members, with approximately 2000 individual members filing comments on the “Proposed Revisions to the Atrazine Interim Registration Review Decision” (Docket No. EPA-HQ-OPP-2013-0266) in addition to this organizational comment. IFB appreciates USEPA’s closer examination of microcosm/mesocosm studies for evaluating the effects of atrazine on aquatic plant communities and encourages USEPA to use **documented and verified instances of atrazine damaging an aquatic plant community rather than modeling.**



ILLINOIS AGRICULTURAL ASSOCIATION®

1701 Towanda Avenue • P.O. Box 2901 • Bloomington, Illinois • 61702-2901

Phone: 309.557.2111 • Fax: 309.557.2559 • www.ilfb.org

"Improve the economic well-being of agriculture and enrich the quality of farm family life."

IFB also encourages the FIRFA SAP to do an in-depth analysis using current data to quantify:

- 1) The environmental benefits of conservation tillage practices utilizing atrazine (versus mechanical tillage).
 - Approximately 70 percent or more of row crop acres are using weed control systems that are consistent with conservation tillage. The majority of US row crop acres, including essentially all of the conservation tillage acres, are treated with a combination of herbicides each year. In the case of the corn-soybean rotation, USDA’s National Agriculture Statistics Service reports that 65 percent of the corn acres are being treated with atrazine, with four other products commonly in use, and then 3 other products are used on the soybean acres (see Table 1 below).

Table 1. Herbicide treated acres in corn, soybean, cotton, and wheat and the most used herbicides (based on NASS reporting data corn - 2019, and soybean-2021).

Crop	No of acres (U.S.)	Planted acres treated with herbicide	% of acres treated with a specific herbicidal active ingredient				
			(million)	(%)	atrazine	mesotrione	glyphosate
Corn	89.1	97	65	42	34	33	29
			Dicamba	sulfentrazone	glyphosate	s-metolachlor	
Soybean	83.1	98	18	21	78	19	

- 2) The environmental benefits of atrazine enabled cover crops and their ability to reduce Nitrogen losses and soil erosion leading to reduced phosphorus losses; and,
- 3) The long-term effects of atrazine
 - As atrazine has been applied annually for over 50 years, can data quantify devastation of aquatic plant communities?

IFB encourages USEPA/FIFRA SAP to conduct a more complete risk assessment of the possible effects of an atrazine on aquatic health.

IFB supports USEPA gathering the Federal Insecticide, Fungicide, and Rodenticide Scientific Advisory Panel (FIFRA SAP) to seek feedback on the outcome of the USEPA's new 2023 evaluation regarding the inclusion of the 11 studies.

As highlighted in IFB's comments in October 2022, in the June 30, 2022 documents, the Agency contends that the 15 µg/L CE-LOC adopted in the 2019 Regulatory Update and 2020 Interim Decision, unlike the 3.4 µg/L CE-LOC proposed in the 2016 draft risk assessment, "was not determined based on an analytical assessment." To the contrary, in 2019, USEPA conducted an updated "quantitative uncertainty analysis" based on the rescoring of 11 underlying cosm studies consistent with the recommendations of the 2012 SAP and chose a CE-LOC value within that range. The 3.4 µg/L CE-LOC was previously determined by selecting a value within a range produced from a quantitative uncertainty analysis that had rejected the 2012 SAP's recommendations. USEPA produced no additional quantitative analysis in support of the 3.4 µg/L CE-LOC. IFB is concerned about the methodology, modeling versus *in situ* measurements used to arrive at the proposed CE-LOC.

In conclusion, IFB supports the FIFRA SAP review of the 11 cosm studies as it is warranted by the age of the studies (1980 - 2002), the scientific complexity of USEPA's determinations, the history of opposing scientific viewpoints and differing Agency determinations, and the very significant practical impacts of USEPA's previously proposed approaches.

Thank you for your thoughtful consideration of these comments. If you have questions, please contact Amelia Cheek, Associate Director of Environmental Policy, at acheek@ifb.org or 309.530.3220.

Sincerely,



Richard L. Guebert, Jr.
President
Illinois Farm Bureau®
1701 Towanda Avenue
Bloomington, IL 61701-2050