November 11, 2011

Office of Pesticide Programs (OPP)
Regulatory Docket (7502P)
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC  20460-001

Petition Requesting Ban on use and production of Atrazine; Notice of Availability
[EPA-HQ-OPP-2011-0586; FRL-8887-6] Save the Frogs

The American Society of Agronomy (ASA) and its International Certified Crop Adviser (ICCA) Program would like to express their concern regarding the potential negative impact to the agricultural industry and the public if the petition requesting a ban on the use and production of atrazine is granted.

ASA and the ICCA Program represent over 21,000 agronomic scientists, researchers and practicing professionals around the world with the majority of its membership located in the United States. CCAs provide agronomic advice and inputs to farmers. We estimate they influence over 50% of the ~320 million acres of productive cropland in the United States. Each CCA averages between one and five million dollars in annual sales of supplies and services. As a group of 13,000 certified professionals, they represent between $13 and $65 billion of crop production inputs annually. They are a major component of the agriculture industry and the US economy.

Certified Crop Advisers (CCAs) are initially tested and are required to receive continuing education in the areas of nutrient management; soil and water management; integrated pest management and crop management. They sign and agree to uphold the CCA Code of Ethics. They pledge to not only do what is in the best interest of their clients (farmers) but also the environment. CCA recommendations are both economically and environmentally sound, supported not only by science but also by practice.

Most CCAs hold either a private or commercial pesticide applicators license. Atrazine itself is a federally restricted product requiring anyone who purchases or applies the compound to have either a private or commercial applicators license. It is not a product that is applied haphazardly. Each treatment is professionally positioned by people and equipment trained/designed to accurately apply restricted products.

Atrazine is an important tool in crop production, specifically, corn, sorghum and sugarcane production. It has a wide window of application both pre and post emergence as well as excellent crop tolerance. When used in combination with other herbicides, atrazine enhances their efficacy, often improving overall performance against difficult to control weeds. It adds another unique herbicide mode of action that
helps in the fight against weed resistance. It is the backbone to many conservation tillage programs that reduce soil erosion, improve water quality and wildlife habitat. Atrazine is an effective tool for enhancing overall crop production.

Atrazine’s Record:

- Atrazine passes the most stringent, up-to-date safety requirements in the world. The U.S. Environmental Protection Agency (EPA) and the Australian Pesticides and Veterinary Medicines Authority have concluded atrazine is safe at levels found in the environment. In addition, the World Health Organization has also favorably reviewed atrazine (2007, 2010).

- EPA’s April 2010 update on atrazine contained the following statement on amphibians “…atrazine does not adversely affect amphibian gonad development based on a review of laboratory and field studies, including studies submitted by the registrant and studies published in the scientific literature. At this time, EPA believes that no additional testing is warranted to address this issue.”

- Based on EPA guidance, two large-scale studies (Kloas, 2007) were conducted in separate laboratories using 3,200 frogs and 100,000 tissue samples to determine whether or not atrazine has an impact on growth, development, survival, or sexual differentiation in frogs. EPA audited and inspected the data from these studies, stating: “The data are sufficiently robust to outweigh previous efforts to study the potential effects of atrazine on amphibian gonadal development” and “there is no compelling reason to pursue additional testing.”

- In an April 2008 story in The New York Times, Yale University scientist Dr. David Skelly found fewer hermaphroditic frogs in agricultural areas where atrazine is used than in suburban areas where it is less likely to be found, saying, "What we found in most of the agricultural ponds we sampled was no evidence of reproductive deformity."

- Despite more than 50 years of atrazine use, scientists have not found credible evidence of an impact of atrazine on a single animal species in the field, let alone a human population.

- Over the past 20 years, deformities and declines in frog populations have been linked to causes such as natural fungal disease, non-native fish, natural parasites and habitat destruction, but never to atrazine.
• The EPA estimates that the total impact on corn, sorghum and sugar-cane growers in the U.S. would exceed $2 billion per year if atrazine were not available.

Atrazine is an herbicide with a long history of safe and effective use. We encourage EPA to consider the scientific evidence and not ban the use or production of atrazine. We also encourage EPA to hold all parties - both pro and con - to the same level of scientific rigor when providing claims related to this issue.

Thank you for reviewing our comments. Please contact us if we can provide any further assistance.

Sincerely,

Dr. Newell Kitchen, President  Russell Duncan, CCA, Board Chair  
American Society of Agronomy  International Certified Crop Adviser Program