



September 1, 2016

RE: Docket ID No: EPA-HQ-OPP-2013-0266

Dear Administrator McCarthy,

On behalf of the Dairy Business Association and the Dairy Business Milk Marketing Cooperative, I am submitting the following comments asking the U.S. Environmental Protection Agency to reject the current draft ecological risk assessment being used in the re-registration process for the herbicide atrazine that would effectively ban the safe and tested use of atrazine.

Farmers around the world have been charged with the immense task of providing an adequate and continuous food supply for a rapidly growing global population. Atrazine has been and can continue to be an essential production tool for farmers in meeting that challenge. Farmers have exceeded expectations time after time and often creating more with less while at the same time implementing more sustainable farming practices showing a commitment to keeping our natural resources safe and clean for generations to come.

The draft ecological risk assessment is based on studies that do not meet the high scientific standards EPA is required to follow. Instead, the Agency used studies EPA's very own 2012 Scientific Advisory Panel deemed to be flawed. Nearly 7,000 scientific studies have been conducted showing atrazine's effectiveness and safety as an important crop production tool. If EPA continues to follow the same inadequacies going forward as in the preliminary assessment, it could lead to a de facto ban on atrazine in a large portion of crop areas in the United States and have a detrimental impact to crop production for our farmers. This would set a troubling precedent for the regulation of not only other farm chemicals but other modern farming practices that have been deemed to be safe.

Adopting this draft atrazine proposal will mean a step backward for conservation measures. Many farmers rely on atrazine for long-acting weed control on their conservation tillage and no-till fields. Banning atrazine would dampen farmers' conservation efforts. A ban would lead to increased soil erosion and fossil fuel use at a time when farmers are striving to implement more sustainable farming practices on their land.

In 2003, EPA estimated banning atrazine would cost farmers \$28 per acre. A more recent University of Chicago study at estimated the value at \$59 per acre. Especially in this time of low commodity prices, any slim profit margins farmers have will be erased if the EPA continues down this path.

Atrazine is one of the most studied and reviewed herbicides in history. EPA is legally bound to use credible scientific evidence in its decisions. We are asking EPA to simply follow the science and reconsider the draft ecological risk assessment.

Sincerely,

John Holevoet

Director of Government Relations, Dairy Business Association