



IL CORN
WWW.ILCORN.ORG

IL CORN GROWERS ASSOCIATION

P.O. Box 1623 (61702)
14129 Carole Drive
Bloomington, IL 61705
P 309.557.3257

October 5, 2022

Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: The Illinois Corn Growers Association comments on EPA's Proposed Revisions to the Atrazine Interim Registration Review Decision; Docket ID: EPA-HQ-OPP-2013-0266

Dear Sir/Madam:

IL Corn Growers Association (IL Corn) would like to take this opportunity to submit comments regarding the proposed amendments to the Atrazine registration. We are disappointed in the proposed Level of Concern (LOC) being reduced from 15 ppb to 3.4 ppb and the illogical list of mitigation strategies. Likewise, we feel the agency has ignored the science and needs to restore trust by basing their decision on facts and not policy.

The 50,000 farmers growing more than 11 million acres of corn in Illinois, are the primary users of Atrazine. One of IL Corn's top priorities is ensuring access to the necessary tools needed to complete that job, while doing so as safely and as conservation focused as possible. Our members have one of the most vested interests in these amendments and want to make sure the outcome is realistic for the farmer and continues to be a practical tool as it has been for over six decades.

We believe it makes sense to periodically review and update the rule as new technology and practices are adopted, however the interim registration should be upheld and the science supporting that reaffirmed. Atrazine is a critical component of weed management programs and not only provides an effective economic option but also allows the use of conservation practices such as no-till or reduced tillage and cover crops to continue and expand. These conservation practices conserve soil, improve soil health, and help mitigate the effects of climate change. The proposed changes to the Atrazine label would no longer make it a top choice product and instead more costly, less effective products would need to be used or mechanical weed control measures that increase soil loss.

IL Corn is proud of the research we have conducted since 2015 on the economics and environmental impacts of various conservation practices through our Precision Conservation Management (PCM) program. Our data will show that if an Illinois farmer had to re-instate a 2+ pass tillage system for weed control, they would lose an average of 1.39 tons of soil/acre. This would also result in GHG emissions of 1.16 metric tons CO₂e/acre.



IL CORN
WWW.ILCORN.ORG

IL CORN GROWERS ASSOCIATION

P.O. Box 1623 (61702)
14129 Carole Drive
Bloomington, IL 61705
P 309.557.3257

When re-opening the interim registration for review, sound science, not policy should be the focus for any changes. We request full transparency in the science and decision-making process for any changes to Atrazine's registration. We also ask the EPA to stand behind their statements to convene a Scientific Advisory Panel (SAP) **before** making any final decisions on a label change or list of mitigation practices, and to include appropriate scientists seen as experts in this field on the panel. The drastic proposed changes to the LOC would impact nearly the entire state of Illinois. Farmers having to choose between impractical mitigation measures, more costly, less effective herbicides or mechanical weed control options that increase soil loss would negatively impact their net operating revenue.

The proposed list of mitigation strategies might sound practical on paper, but don't meet the challenges and reality facing Illinois farmers. These practices assume all acres can be managed similarly and have similar characteristics. Illinois is very diverse north to south in the topography and soils. Taking flat, black, productive ground out of production to add a buffer or filter strip when the risk of runoff is minimal and the cost to take that land out of production is high doesn't make sense. Likewise, the best weed control approach is to terminate weeds when they are small, this allows for better control and less chance of resistance to occur. Eliminating the use of Atrazine pre-plant would allow weeds to grow larger, making them harder to control and increase of level resistance leaving farmers with even fewer options for management. Cover crops can be a tool to help suppress weeds, improve soil health, and reduce soil loss. However, they need to be terminated before a cash crop can be grown. Again, eliminating or reducing the use of Atrazine would mean choosing between the right environmental choice and most practical and economical one.

IL Corn would like to thank the EPA for the opportunity to comment on this important issue. We look forward to continued discussion with all stakeholders in ensuring a practical and standing decision can be reached.

Sincerely,

Martin Marr
President, IL Corn Growers Association



IL CORN GROWERS ASSOCIATION

P.O. Box 1623 (61702)
14129 Carole Drive
Bloomington, IL 61705
P 309.557.3257

Comment Tracking Number
18v-ofm3-oi14