



**AGRIBUSINESS**  
ASSOCIATION OF IOWA

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October 5, 2022

Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

Re: Atrazine registration review, ID EPA-HQ-OPP-2013-0266-1627

To Whom It May Concern:

The Agribusiness Association of Iowa (AAI) exists for the purpose of advocating, communicating, and educating on behalf of a proactive, profitable, and environmentally responsible professional agribusiness industry. AAI's membership consists of almost 200 businesses with over 1,100 locations across the state that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture.

Many of our members' locations employ certified pesticide applicators who apply pesticides to their customers' fields. We appreciate the opportunity to submit comments regarding the atrazine registration review because we have many concerns on how potential label changes could negatively affect the environment, pest resistance, farm production, and profitability.

We need more certainty and consistent pesticide labels from the EPA. While harvest of the 2022 crop is currently underway, plans are already being made for the 2023 crop including seeds, crop protection, and conservation practices. We thought the science was settled on a workable atrazine registration. Now we are submitting comments and trying to understand how potential label changes will affect our businesses and the services we provide to farmers.

In 2020, only two crops ago, the EPA set the aquatic level of concern (LOC) at 15 parts per billion (ppb). This was based on sound science and widely accepted. Atrazine has been in use for many decades, and now the LOC is being drastically reduced to 3.4 ppb. EPA needs to explain how the science has changed and convene a Scientific Advisory Panel before lowering the LOC and modifying the label with problematic, expensive mitigation measures.

The proposed mitigation measures come with costs, complicated record keeping, and confusing responsibilities. Conservation practices are not the responsibility of a commercial pesticide applicator who would bear the liability of following a more complicated label. In Iowa, a majority of the cropland is owned by non-operator landowners. Tenant farmers rent the land, often relying on services provided by agribusinesses for crop protection and nutrient management. These are delicate relationships that are important for increasing conservation practices on the land. Label requirements will only complicate these relationships.

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Increased costs and complications will discourage the use of atrazine with consequences for the environment. In Iowa, EPA has strongly encouraged our state's development and implementation of the [Iowa Nutrient Reduction Strategy](#) to reduce nutrient loss to Iowa waters and the Gulf of Mexico. We have made great progress as a state to reduce tillage and decrease phosphorus losses compared to our 1980-1996 baseline. If atrazine is less practical, profitable, or effective, the use of tillage for weed control will increase, leading to increases in soil erosion, phosphorus losses, and greenhouse gas emissions while decreasing soil health and water quality.

EPA also strongly encouraged our state's development of the [Iowa Pest Resistance Management Program](#) to protect Iowa crops from costly pest resistance. A University of Missouri Extension weed scientist was quoted in an [August 25 Successful Farming article](#) saying:

- When considering herbicides to control of pigweed species like Palmer amaranth, use herbicides with multiple effective modes of action, Bradley says. The most effective programs include residual herbicides applied at full rates prior to soybean planting followed by an additional application of an "overlapping" residual herbicide later in the season.

The proposed label changes discourage preemergence and full rate applications of atrazine which is frequently used in combination with other modes of action.

The proposed label changes raise many questions and concerns:

- Does the prohibition of aerial application also apply to unmanned aerial vehicles (drones)? This emerging technology can be more precise than applications from traditional aircraft.
- Does the precipitation restriction apply to a 50% chance of rain? What specifically qualifies as a runoff forecast? How does an applicator choose between conflicting rain forecasts?
- How is a field classified if only a small portion of its soils are highly erodible? Does the whole field become highly erodible and subject to additional runoff reduction practices?
- Does the cover crop need a certain biomass production? When can the cover crop be terminated?
- What other practices such as water and sediment control basins can be added to the list?
- How will EPA integrate pick lists when multiple active ingredients are used together?

Thank you for the opportunity to provide comments regarding the atrazine registration review and the potential negative consequences of the proposed label changes for our members and their customers.

Sincerely,

Bill Northey  
Chief Executive Officer  
Agribusiness Association of Iowa

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