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[Date]

Office of Pesticide Programs Regulatory Public Docket

Environmental Protection Agency Docket Center, (28221T)

1200 Pennsylvania Ave. N.W.

Washington, DC 20460-0001

Re: EPA-HQ-OPP-2013-0266

Dear Office of Pesticide Programs:

I strongly urge EPA to correct the data and methodological errors present in the draft ecological risk assessment of atrazine, as currently posted for public comment. Its conclusions rest on scientific errors and flawed interpretations, and are inconsistent with many of EPA’s previous conclusions and assessments by other regulatory agencies around the world.

As you know, atrazine is one of the most closely examined pesticides in the world. Its safety has been established in nearly 7,000 scientific studies over more than 50 years. It is an essential product for weed control and farming, with more than half of all U.S. corn acres, and two-thirds of U.S. sorghum and sugarcane acres, relying on this safe and essential herbicide to produce food sustainably.

Various economic analysis studies show farming without atrazine would cost corn growers up to a range of $30 and $59 per acre. While corn prices have fallen since some of the reports were written, the availability of atrazine for use in corn could make the difference in growers making a profit or loss on their crop.

This important tool for sustainable agriculture deserves a scientific process that includes the best available data and a thorough and comprehensive scientific review. Several rigorous, high-quality scientific studies were discounted by the draft ecological risk assessment in favor of studies found flawed by EPA’s own 2012 Scientific Advisory Panel (SAP).

The cornerstone of our regulatory process must continue to be the best science and data. Flawed risk assessments like the one at hand threaten the credibility of the review and regulatory process as well as farmers’ ability to maintain high crop yields and reduced soil runoff through the use of atrazine.

Thank you for your consideration.

Sincerely,