



## *Arizona Farm Bureau Federation*

325 S. Higley Rd, Suite 210  
Gilbert, AZ 85296

September 3, 2019

OPP Docket  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

RE: Docket No. EPA-HQ-OPP-2009-0361-2340: Glyphosate Proposed Interim Registration Review Decision

Dear Sir or Madam:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) proposed glyphosate interim decision and reiterate the comments we submitted previously to the draft human health risk assessment docket highlighting the benefits glyphosate provides to Arizona's farmers. Additionally, as a member of the American Farm Bureau Federation, we support the comments they have submitted to this docket.

Weeds are an ever-persistent problem in crop production. If weeds are not managed quickly and effectively, they can choke out a crop by competing for light, nutrients, moisture and serving as a refuge for insects and diseases. Both farmers and pest control advisors acknowledge the importance of using products such as glyphosate to control weeds. Consequently, it is critical that glyphosate remain a viable option in weed management strategies.

Cotton is a crop that highlights the importance of ensuring glyphosate is readily available as a weed control tool. Cotton plants grow relatively slowly; it generally takes eight or more weeks for cotton plants to reach full ground shade. This means the crop is sensitive to weed competition for a longer time. Furthermore, weeds that remain in a cotton field can interfere with harvesting and reduce lint quality due to trash and staining. Weed management is crucial to allowing Arizona's cotton farmers to grow some of the highest-quality cotton in the country.

Additionally, the majority (97%) of cotton grown in Arizona is herbicide tolerant and/or insect resistant. Growing herbicide resistant cotton has been crucial to giving Arizona farmers the ability to adopt conservation tillage and no-till farming practices. Farmers can plant cotton directly into the stubble from a prior crop without plowing, disking, or otherwise disturbing the soil. However, in order to make a conservation or no-tillage system successful, producers must have an option for weed control.

Glyphosate has proven to be an important option for managing weeds in conservation and no-till farming systems.

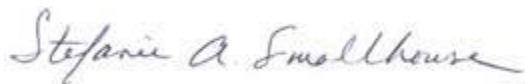
Furthermore, glyphosate can be a cost-effective method for controlling broad-spectrum weeds in fallow fields. Unlike other herbicides whose soil residual activity may delay planting a new crop after application, glyphosate has little to no soil residual activity, allowing a producer to plant a new crop soon after application.

Another important application for glyphosate is in the sanitation of weedy species anywhere along water distribution systems. There are few effective and safe alternatives for maintaining these environments weed-free. Weeds in these areas are harborages for more weed seed and other pests, but can also produce environments hazardous to workers who have to navigate ditch banks and other irrigation systems so crucial to crop production.

Since glyphosate was first registered in 1985 numerous studies have been conducted to determine its effects on humans and the environment. The EPA in its own review of all relevant data and in accordance with the agency's 2005 Guidelines for Carcinogen Risk Assessment has determined glyphosate is "not likely to be carcinogenic to humans." The evaluation EPA conducted is more robust than that of the International Agency for Research on Cancer, as the EPA's research was more extensive and included the review of additional studies consistent with determining human carcinogenic potential. Furthermore, EPA notes its conclusion is consistent with other regulatory authorities and international organizations. Finally, the EPA's Draft Human Health Risk Assessment and supporting documents support this conclusion in addition to finding that glyphosate poses no undue risk to worker and applicators when used according to label, adsorbs strongly to soil and is readily degraded by soil microbes, and has minimal effects on birds, mammals, fish, and invertebrates.

Glyphosate is an important weed management tool that growers in our state have used for many years. While the benefits of this tool are numerous and widespread, the risks associated with it are minimal; we see no indication that glyphosate poses an unreasonable risk to human health or the environment. Accordingly, we urge the EPA to continue to allow its use.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse".

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation