



Arizona Farm Bureau Federation

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January 11, 2021

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

RE: Docket No. EPA-HQ-OPP-2011-0855-0208; Registration Review: Proposed Interim Decision for Paraquat

To Whom It May Concern:

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. Many of our members rely on paraquat as a crop protection tool to produce high quality crops and sustain their operations. Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision for paraquat.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and/or ecological risk assessment for paraquat (Docket ID # EPA-HQ-OPP-2011-0855-0133), we noted the importance of this product in various crops. We request incorporation of these previous comments for consideration in EPA's current comment period.

As a member of the American Farm Bureau Federation, we support the comments they have submitted on the Proposed Interim Decision for Paraquat. In addition to the information they have provided, below are additional comments regarding how elements of the Proposed Interim Decision expressly impact Arizona farmers.

Application rate in Alfalfa

Although alfalfa seed production occurs on a small scale in Arizona, paraquat is a critical product used as a defoliant prior to mechanical harvesting. According to comments submitted by the Arizona Pest Management Center in December 2019 (Docket ID # EPA-HQ-OPP-2011-0855-0203), paraquat is the only available chemical option and is used on all harvested acres at or near the maximum use rate.¹ Given the proposed interim decision to limit the single application maximum rate for alfalfa to 1.0 lb.

¹ Fournier, Al, William McCloskey, Peter Ellsworth, Ayman Mostafa, and Wayne Dixon. Paraquat Dichloride Use and Benefits in Arizona Agriculture, Comments submitted to EPA by the Arizona Pest Management Center, December 16, 2019. Available online at https://cals.arizona.edu/apmc/docs/Paraquat_Comments_APMC_12-16-19.pdf.

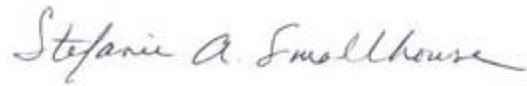
active ingredient per acre, we recommend EPA maintain this application rate with no further reduction. The mechanized alternative for defoliating alfalfa seed is not economically practicable, as this process involves more time and puts the drying alfalfa at greater risk of damage due to weather events.

48-hour Restricted Entry Interval for all Crop Uses Except for Cotton Desiccation

We also strongly urge EPA to reconsider the seven-day restricted entry interval (REI) for cotton desiccation. As noted in our previous comments, there are times when Arizona farmers require the use of paraquat for its fast-acting quality as desiccant in cotton. It allows farmers to quickly begin harvest four to five days following an application of paraquat, which can make a difference between turning a profit or taking a loss in some situations.

We support EPA's efforts to properly consider the benefits and risks of chemicals and encourage the agency's strong consideration of the benefits of paraquat throughout the registration review process. We look forward to continuing to work with the EPA to ensure farmers have access to crop protection products such as paraquat and appreciate your consideration of our comments.

Sincerely,

A handwritten signature in dark ink, reading "Stefanie A. Smallhouse". The signature is written in a cursive, flowing style.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation