



Arizona Farm Bureau Federation

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May 7, 2021

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2016-0080; Registration Reviews Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Sodium Chlorate

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. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessment of sodium chlorate and highlights the important role this chemistry provides to Arizona's farmers.

Sodium chlorate is registered as a systemic plant growth regulator (desiccant/defoliant) and herbicide. According to the Arizona Pest Management Center (APMC) sodium chlorate has regular but declining use in Arizona cotton, based on pesticide use reporting data, from a mean of about 22,300 acres treated (2010-2012) to a mean of 1,770 acres (2017-2019). Annual uses are also reported in peppers. Occasional uses (not every year) are reported in other crops, including alfalfa, potatoes and sorghum.

The primary use of sodium chlorate in Arizona crops is as a desiccant. As noted above, annual usage has dropped significantly in its use in cotton production, and the APMC data notes some of the same in peppers. According to pest control advisors (PCA) a key factor in this reduction in use in cotton is a packaging change where the product is no longer sold in bulk, making it less practical and cost effective and practical to use. Additionally, PCAs have stated that there are other desiccants on the market that are more effective. However, despite the overall reduction in the use of sodium chlorate, there is still a place and demand for the product. For example, sodium chlorate in combination with paraquat is a good option when a secondary desiccant application is needed. This is especially true in cotton growing regions of the state where hard freezes occur during defoliation season and the initial defoliant application is rendered ineffective.

Sodium chlorate is also used as a desiccant to dry-down grain sorghum prior to harvest. According to PCAs knowledgeable about this practice, it is the only effective material available for this use. In years when an early freeze occurs, they can forego this application and the crop will dry down naturally.

Similar to cotton, its use has become less practical for large acre crops since sodium chlorate is not available in bulk, and this use pattern has declined.

We believe sodium chlorate should remain a viable crop protection option. Its availability as a desiccant and crop protection tool is critically important to maintain the productivity and profitability of Arizona's farmers. We strongly encourage the EPA to consider the safe track record and the economic importance of sodium chlorate to Arizona's farmers as it conducts its human health and ecological risk assessment.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid, with a long, sweeping tail on the final letter.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation