

# Ohio AgriBusiness Association



November 1, 2011

Office of Pesticide Programs  
Regulatory Public Docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington DC 20460-0001

Re: EPA Docket Number EPA-HQ-OPP-2011-0586

The Ohio AgriBusiness Association (OABA) appreciates the opportunity to provide comments in support of the continued use of atrazine. For more than fifty years atrazine has been safely and effectively used to produce corn, grain, sugar cane, sorghum and other crops to feed not only Americans but people worldwide. This would not be possible without the use of crop protection products such as atrazine. OABA is concerned with the recent petition from the group "Save the Frogs" asking the agency to ban the use and production of atrazine. No information submitted in the "Save the Frogs" petition justifies a change in regulatory action.

Despite more than fifty years of atrazine use, scientists have not found credible evidence of an impact of atrazine on a single animal species in the field, let alone a human population. Over the past 20 years deformities and declines in frog populations have been scientifically linked to causes such as natural fungal disease, non-native fish, natural parasites and habitat destruction, but never to atrazine.

In 2007, EPA concluded: "atrazine does not adversely affect amphibian gonadal development based on a review of laboratory and field studies, including studies submitted by the registrant and studies published in the scientific literature." In its April 2010 update, EPA stated: "EPA believes that no additional testing is warranted to address this issue."

In addition, based on EPA guidance, two large-scale studies (kloas, 2007) were conducted in separate laboratories using 3,200 frogs and 100,000 tissue samples to determine whether or not atrazine has an impact on growth, development, survival, or sexual differentiation in frogs. EPA audited and inspected the data from these studies, stating: "The data are sufficiently robust to outweigh previous efforts to study the potential effects of atrazine on amphibian gonadal development" and "there is no compelling reason to pursue additional testing."

The facts show, through the most extensive review of any crop protection product, that the current registration and label requirements for atrazine use are appropriate. OABA looks forward to the continued use of atrazine and I would like to express my appreciation for the opportunity to submit comments on behalf of our members.

Sincerely,



Christopher Henney  
President & CEO