



TENNESSEE FARM BUREAU FEDERATION

June 7, 2024

Mr. Charles Smith
Director, Registration Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket No. EPA-HQ-OPP-2020-0250-0008; Memorandum Supporting Proposed Decision to Approve Registration for the New Active Ingredient Isomer, Glufosinate-P

Dear Director Smith:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments regarding the registration of new technical and end use products containing new active ingredient L-Glufosinate (enriched L-isomer of the registered active ingredient Glufosinate Ammonium). On behalf of our member producers, we support the use of glufosinate-P to control weeds in non-tolerant and glufosinate-resistant corn, sweet corn, soybeans, cotton, and canola and encourage the Environmental Protection Agency (EPA) to approve this request.

Glufosinate-P is an isomer of the currently registered herbicide glufosinate and kills plants by inhibiting photosynthesis in the affected plant. This new active ingredient offers flexible application timing, allowing for post-emergence weed control for over-the-top use on glufosinate-tolerant crops and early season use in non-tolerant canola, cotton, corn, and soybeans.

During their risk assessment process, EPA determined glufosinate-P poses no risks to human health. However, EPA did identify risk to “terrestrial and aquatic plants and chronic risk to mammals, bees, and non-bee terrestrial invertebrates that forage in treated fields and may be exposed to residues on food items exposed to off-site spray drift”. As a result, EPA has outlined mitigation measures to reduce off-target exposure. While we support the use of conservation practices to protect non-target species, TFBF encourages EPA to ensure the recommended mitigation measures are workable, cost-effective, and flexible enough to work on different farm types, sizes, and locations.

Growers need every viable option to respond to weed pressures and combat persisting weed resistance issues. New options provide a more comprehensive weed control

program for growers and prevent further weed resistance risks. For these reasons, TFBF encourages the EPA to approve a label for glufosinate-P.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry". The signature is written in black ink and is positioned below the word "Sincerely,".

Eric Mayberry

President

Tennessee Farm Bureau Federation