



## TENNESSEE FARM BUREAU FEDERATION

---

February 12, 2025

Jean Overstreet  
Director, Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460-0001

**Re: Docket No. EPA-HQ-OPP-2013-0266; Atrazine; Updated Proposed Mitigation for the Interim Registration Review Decision**

Dear Director Overstreet:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the interim registration review decision for atrazine. On behalf of our member producers, we express concern with the Environmental Protection Agency's (EPA) recalculation of the concentration-equivalent level of concern (CE-LOC) and updated mitigation proposal for atrazine. TFBF strongly supports the continued use of atrazine without additional restrictions and is concerned about EPA's proposed changes and subsequent requirements of this product.

TFBF represents a diverse group of commodity producers across the state and, with over 695,000 members, is the largest general farm organization in Tennessee. Agricultural producers in Tennessee and nationwide are deeply interested in protecting the environment based on philosophical beliefs and practical self-interest. Responsible use of crop protection products is a foundational component of a farmers' daily use of best management practices. We oppose the curtailment of the proper use of crop protection products. Environmental regulations should consider the essential nature of efficient and safe use of pesticides as a basic and integral part of agricultural production.

Atrazine is a widely used herbicide to control annual broadleaf and grass weeds for numerous crops and grasses, most notably corn, sorghum, sugarcane, and turfgrass. It has been registered with the EPA for decades, and numerous products used for weed control contain atrazine. Tennessee is a large corn-producing state, and corn growers here use atrazine due to its reliability, safety, and effectiveness in addressing weed pressures. It is a low-cost, long-acting, environmentally friendly, and safe product which has long contributed to the increased adoption of conservation tillage and no-till practices across the country. According to the University of Tennessee Institute of Agriculture's Tennessee Nutrient Management Report, 87% of farmers utilized no-till and conservation tillage practices in 2022, largely due to the availability of crop protection products like atrazine. EPA must recognize these benefits before imposing restrictions on the safe use of products like atrazine and consider the negative impacts of

reverting to heavy tillage practices on the very water sources EPA is attempting to protect with these restrictions.

Part of this interim registration decision for atrazine is EPA's adherence to the Herbicide Strategy as part of the larger Endangered Species Act Workplan. These strategies establish a mitigation practice point system and spray drift buffer distances which are set for each active ingredient as it is registered or re-registered. EPA focuses on field-by-field mitigations for farmers to follow rather than a total farm approach. For any given farm regardless of its size, a farmer may split their farm into a multitude of individual fields. This approach would require a farmer to outline and calculate mitigation points and buffer distances for every field AND every active ingredient they use. Although this specific review focuses solely on atrazine, EPA must recognize the excessive amount of time and resources this outrageous amount of record-keeping will take when re-registering products, understanding that farmers use more than one active ingredient during any given season.

For years, the CE-LOC for atrazine, or the concentration of atrazine in water that is expected to adversely affect aquatic plant communities, has been set at 15 µg/L. This number is used to determine the need for mitigation responses and has guided EPA to determine mitigation points relative to their Herbicide Strategy. During the ecological assessment portion of the review process, EPA has proposed to almost cut the CE-LOC for atrazine in half, reducing it to 9.7 µg/L. As a result, EPA has identified watersheds exceeding this new CE-LOC and is proposing required numbers of mitigation points based on the concentration of the watershed. Fields within watersheds with exceeding concentrations could need as many as six mitigation points to comply and use atrazine according to the new proposed label. Based on EPA's proposed maps, significant portions of middle and west Tennessee, some of the state's most prominent production agricultural regions, would be required to accumulate these points. TFBF is concerned about increased restrictions on atrazine use in heavy agricultural areas where corn is highly produced. Farmers only have so many resources at their disposal to address weed pressures, and imposing stringent restrictions, most of which come at a significant cost to the farmer, is only going to attribute more to a farmers' struggle to maintain positive margins.

The re-registration of atrazine includes new requirements for applicators to access the *Bulletins Live! Two* website. Although we acknowledge its intention to provide additional information, there are concerns about the practicality on farms across the state and country. Access to reliable rural broadband is still a very real issue throughout Tennessee. In the map located in Appendix One, provided by the Tennessee Department of Economic and Community Development which oversees the state's broadband development, the areas in green represent regions which can meet 100/20 megabits per second (mbps) and the areas in red represent regions lacking 100/20 mbps. Based on Appendix One, a large portion of the state of Tennessee still needs reliable broadband access, particularly in areas of production agriculture. EPA cannot reasonably expect farmers to comply with virtual label restrictions if they do not have reliable internet on their farms to access the online program. Not only does it make a farmers' job more difficult, but we are also concerned with the implications on a farmer if they cannot access the label and get penalized for not following it.

Atrazine plays a crucial role in a farmer's crop protection program. While TFBF understands the importance of biological reviews during a pesticide's reregistration process, we must not lose sight of the critical need for these products in the success of the food supply. While this interim registration review is specific to atrazine, we cannot forget the larger impact that decisions EPA makes for atrazine have on other critically important pesticide products. Because of this, we urge EPA to reconsider imposing additional restrictions on atrazine.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry  
President  
Tennessee Farm Bureau Federation

# Appendix One

