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# GEORGIA AGRIBUSINESS COUNCIL

COUNCIL MISSION: "To advance the business of agriculture through economic development, environmental stewardship and education to improve the quality of life for all Georgians."

May 3, 2016

RE: Paraquat Dichloride

I write to you today as the President of the Georgia Agribusiness Council and on behalf of the more than 1000 member companies of the Council to state our opposition to EPA's proposed changes to the use and application of paraquat. We believe these changes are unnecessary and will create even more challenges for Georgia growers to protect their crops. Paraquat has been used on farms since the 1960s and is still one of the most commonly used herbicides all over the world.

First, farmers across Georgia need access to crop protection technologies to keep them competitive and sustainable. The use of paraquat benefits many of the crops produced in our state's \$74 billion ag economy. It is an important herbicide for control of many problem weeds in berries, corn, cotton, peanuts, sorghum, soybeans, and other crops grown in Georgia. Many of the proposed requirements will make it very restrictive to purchase and apply paraquat products, putting unnecessary burdens on our growers.

Second, with a commitment to the environment, the Council is active in efforts to advance conservation tillage practices. Such practices save fuel, water, and help reduce soil erosion. EPA even acknowledges that the runoff of sediment into our waterways is the top pollutant in U.S. streams and rivers. Paraquat is a critical component of many conservation tillage programs and it provides an alternative mode of action for managing weeds that have developed resistance to glyphosate. These proposed regulations would needlessly undo some of the benefits gained through many years of conservation tillage practices.

Finally, required label changes are costly and needless. As an RUP, licensed users already understand the protections that should be taken with the various classifications of pesticides - that is one of the reasons they went through pesticide use training. Prohibiting applications with hand-held equipment is too restrictive. Moving to a closed system would be good to encourage, but not require. Such limitations are simply impractical for some crops in certain situations. One-size-fits-all often results in more problems than solutions and we believe that is what these requirements will do for Georgia farmers and applicators. In addition, setting restrictions in place that only allow for Certified Applicators to apply the product is sure to fail. Farms are complex and having staff make applications of paraquat, or any RUP, when they are under the supervision of a Certified Applicator should be up to the grower's discretion. Required training for every employee that might apply this product is setting an unjustifiable standard.

These are just some of the reasons we do not support EPA's proposed increased use restrictions on paraquat. We hope you will consider these comments in your decision. Our farmers, environment, and rural economies are counting on you.

Sincerely,

Bryan Tolar  
President

