

Atrazine Scientific Advisory Panel Meeting

September 15, 2010

Comments by David C. Bridges, President, Abraham Baldwin Agricultural College

Thank you for allowing me to speak to you this morning. My name is David Bridges, I am the President of Abraham Baldwin Agricultural College. I am also a Professor in the College's School of Agriculture and Natural Resources and in the School of Science and Mathematics.

Much of my career has been dedicated to quantifying the impact that pests have on U.S. agriculture and on modeling the benefits that accrue to farmers and consumers as a result of pesticide usage. I have worked in various capacities with EPA, USDA and FDA over the past 25 years. During the 1980s my colleagues and I developed methods for quantifying the benefits of pesticide use in U.S. agriculture.

In the mid-1990s I was part of a team that conducted the most comprehensive evaluation of the use and benefits of triazine herbicides that had ever been conducted at that time.

Over the past six months, colleagues from around the country and I have conducted another comprehensive assessment of the benefits associated with triazine use, especially atrazine use in corn and sorghum.

I am fully aware that this SAP was convened to address science issues. You are not particularly concerned with benefits.

However, I suggest respectfully that you appreciate your decisions are not made in a vacuum. Other important issues impinge. They can, and should, serve to raise or lower the bar, especially when convincing scientific evidence showing harmful effects to the environment is absent.

Most of us here today are scientists, engineers or both. We seek truth and knowledge. One hopes that we know absolute certainty itself is elusive.

But not here.

After 50 years we are certain about the safety and the benefits of using atrazine.

Your task becomes trading this certainty for layers of both uncertain science and the absolute elimination of the benefits atrazine has provided for 50 years.

More importantly, I wish to make the point that the level of certainty with respect to benefit is very high, as well as the certainty that losing the product will have profound negative impact on the U.S. economy.

Use and Reliance

All of us know that atrazine is the most commonly used herbicide in American history.

For the more than 50 years since atrazine's registration, atrazine has been used by more American farmers than any other herbicide. It has been estimated that more than 500,000 U.S. farmers use triazine herbicides annually. More than one-half of U.S. corn acreage, nearly three-fourths of the U.S. sorghum acreage and about 90% of the U.S. sugarcane acreage is treated annually with atrazine. Atrazine and simazine have been used continuously on more than 30 crops for more than 50 years.

I suggest the panel should not underestimate the recoil and impact that a decision to limit triazine herbicides will have on American agriculture and indeed on the U.S. economy and rural America in particular.

Impacts will be felt by three groups:

- Growers
- Consumers
- The public at large

Growers

Should atrazine no longer be available, the following effects will occur:

- Farmers will lose the herbicide that has been the mainstay of corn weed control for more than 50 years
- The combination of increased weed control costs and yield losses will seriously challenge profitability for American farmers.
- Farmers will lose their most potent weapon to fight resistant weeds
- Farmers will become more reliant on glyphosate
- Farmers will face greater prevalence of glyphosate-resistant weeds
- Farmers will find it more difficult and costly to control glyphosate-resistant weeds in rotational crops
- Farmers will use herbicides that are often less effective, in some cases more expensive, and which do not enjoy the benefits of having been used safely and reliably with consistent results for more than 50 years, thus introducing a high level of uncertainty on the farm.

Consumers

- Consumers of corn, sorghum, sugarcane, poultry, pork, beef and dairy products are liable to see price impact.

Public at large

- This decision is not carbon neutral! It will result in increased on-farm use of petroleum fuels, resulting in a larger carbon footprint
- A 30-year trend in the increase of conservation farming practices will come to an end resulting in
 - Reversion to conventional tillage (plowing)
 - Increased soil erosion
 - Increased siltation of streams
 - Increased sedimentation
 - Increased nutrient loading into streams
 - Decreased biological diversity on farms
- Loss of as many as 48,000 American jobs related to corn production

In closing, make your decisions based on science, sound and convincing science. Obviously, uncertainty often leads to caution and precaution. Make sure that the amount of caution and precaution you take is appropriately weighed against the relative risks associated with regulation. Make no mistake, caution on one front presents risks on other fronts. Facing limited and mechanistically understood risks is better than facing unknown risks.

These herbicides are essential for agricultural production. Massive changes will occur with unrealistic regulation of these herbicides. Make sure that you understand how your decision will affect change. Make sure that consideration is given to the likelihood of unintended consequences. For example, the use of conservation tillage has dramatically reduced soil erosion and siltation of America's surface waters. Atrazine is vitally important to the continued use of conservation tillage practices, which reduce soil erosion and contamination of surface waters with silt and nutrients, whose negative impacts are well established. More herbicide will be used if the triazines are inappropriately regulated. Are the alternatives safer? How many alternative herbicides have a 50-year safety record?

When faced with weak, little or no evidence to condemn a product, or when uncertainty abounds on one front, consider that this product has been used safely for more than 50 years. Stewardship of this product has been and continues to be exceptional. Consider the weight of the other evidence and the potential impact of unintended consequences that may result from an overly cautious and errant decision.

This is far more than an academic exercise. The impact of your decision will be far reaching. Losing the triazine herbicides will result in an unprecedented disruption of the world's most productive agricultural system!!

Thank you for devoting valuable time to this important process.

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