

## Atrazine Registration Review

### *Latest EPA Action Threatens Atrazine's Future*

On Nov. 5, 2020, EPA published its draft biological evaluation (BE) of atrazine. A comment period ends on Feb. 19.

The BE is an assessment of risks to listed endangered or threatened species from labeled uses of atrazine. It also includes a draft ecological effects assessment and determines the toxicological endpoints—the range of acceptable amounts of atrazine in the environment—to be used in EPA's ecological effects determinations.

EPA inexplicably found that atrazine is likely to adversely affect nearly all species and critical habitats in the continental United States, including some that are already extinct. This could affect the future availability of atrazine in the marketplace.

#### **SPECIFIC CONCERNS**

- EPA failed to fulfill commitments to incorporate the best available science and adopt a quantitative weight of the evidence approach to endpoint determination. A submitted analysis that included the most up-to-date studies on ecological toxicity and exposure to help in this effort was ignored.
- EPA has not responded to all public comments, including grower concerns, as required by law. The agency had earlier made a commitment to growers to address in the BE issues identified by outstanding comments on previous registration review decisions — but that has not happened. These included: concerns about methodology; use of poor data and low quality scientific studies; failure to use a rigorous quantitative weight of the evidence approach; and the establishment of too-conservative ecological endpoints. These same issues have been repeated and compounded in the BE and if not fixed, could affect the future availability of atrazine in the marketplace.
- EPA is transferring to the U.S. Fish and Wildlife and National Marine Fisheries Service (the Services) its responsibility to make accurate and realistic assessments of potential impacts of atrazine to listed species.
- Other flaws include counting as affected by atrazine a number of extinct species that have been recommended by the Services for delisting due to extinction, such as the southern acornshell, which was last collected in 1973, and the upland combshell, last collected in 1986.

#### **WHY IT MATTERS**

- If the current BE is allowed to stand unchanged, poor quality science will have inaccurately depicted atrazine as a threat to listed species. This false reputation could restrict the use and even availability of a crucial crop protection product that is effective and low-impact on the environment.
- **Banning atrazine is a top priority of well-funded activists.** They believe if they can ban a product that has been proven safe for over 60 years, they can ban any crop protection tool.
- We can't allow that to happen. **We must keep the pressure on EPA to get the science right.**

## TELL EPA

- **Don't delegate this important responsibility to the Services**, who lack the time and resources to fully evaluate each species and habitat assigned as "likely to be adversely affected" by atrazine.
- **Fulfill its commitments.** Answer all public comments. Revisit its ecological endpoints determinations provided in the draft BE, update its approach and endpoints consistent with the Agency's commitments to incorporate fully the scientific comments received, incorporate the most recent and best available data, and employ a rigorous quantitative weight of the evidence approach. Then publish an update to the draft BE identifying the new ecological endpoints and ask all stakeholders to review and provide input on the updated ecological endpoints through a public comment period.
- **Tighten up the process.** Treat species likely to be affected by atrazine as a group, not individuals. Don't include already-extinct species as "likely to be adversely affected" by atrazine.
- **Get the science right.** Make sure high-quality studies carry more weight than low-quality studies in the decision going forward – as EPA promised to do. This decision will have a big impact on the every day usage of atrazine – as well as future revaluations. If this broken process fails atrazine, it could jeopardize many other key active ingredients and agricultural products in the future.
- **Share how you use atrazine.** Explain why atrazine is important to your farm and your conservation efforts. We must constantly remind EPA of the real-world implications of this key crop protection tool and lack of suitable replacements. From conservation, to effectiveness, to the \$30/acre replacement cost, the benefits and sound science should play a significant role in this EPA decision.

## HERE'S HOW TO POST A PUBLIC COMMENT ON ATRAZINE

1. Go to <http://www.regulations.gov>. Enter docket no. **EPA-HQ-OPP-2020-0514** in search bar, then click "Search."
2. Click the blue "**Comment**" box below, "**Draft Endangered Species Act Biological Evaluations: Atrazine, Simazine, and Propazine Registration Review.**"
3. Type or paste your comments into the free-text box and upload any attachments you wish to submit, then click the "Continue" button at the bottom of the page.
4. Follow instructions on the page to finalize your submission and click "**Submit comment.**"

Submit your comments by **Feb. 19, 2021**.