



August 30, 2019

Office of Pesticide Programs (OPP) OPP Docket,
Environmental Protection Agency Docket Center (EPA/DC), (28221T),
1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Subject: Glyphosate Proposed Interim Registration Review Decision – Western Growers
Comment on EPA-HQ-OPP-2009-0361-2340

Western Growers, is a 92 year old trade organization, representing growers and handlers of fresh fruits, nuts and vegetables grown and sold from the states of California, Arizona, Colorado and New Mexico. Our members and their employees provide half of the nation's fresh fruits, vegetables, and tree nuts, including nearly half of America's fresh organic produce. For generations, we have provided a wide variety of healthy food choices to consumers.

Western Growers writes to you today to offer our preliminary comments on the continued registration and use of glyphosate in our ongoing attempt to highlight the critical importance of this product to western fresh fruit, nut, and vegetable producers.

Glyphosate is a crucial herbicidal compound that provides highly efficacious broad spectrum control of key weeds and is of economic importance to a wide variety of specialty fruit, nut, and vegetable crops. Glyphosate is used in orchard, vineyard and row crop settings and has become a lynchpin product for specialty crop agriculture. In an era where labor is scarce and hand weeding is much more costly this technology is important to the specialty crop sector and more particularly to small and mid-sized farmers.

Not only is Glyphosate a unique tool that provides broad spectrum activity on weeds, at the same time it offers a strong safety profile for humans, animals, and the environment through systemic mechanisms and lack of residual activity. Put simply, it is easy to use, low in cost and has a low potential for adverse impacts.

Glyphosate is also one of, if not the most studied active ingredients in the world. There is a preponderance of scientific data that has been developed and compiled over the last four decades that

demonstrate that glyphosate exhibits relatively low toxicity¹, does not disrupt endocrine signaling², is not mutagenic or carcinogenic³, does not persist in the environment and does not bioaccumulate⁴.

Glyphosate is a critical control for weeds around the world and in numerous settings beyond agriculture. In the specialty crop sector, maintaining access to this important tool is vital as it promotes both environmental and economic health, and affords growers the opportunity to produce an abundant supply of fresh fruits, nuts, and vegetables.

Western Growers acknowledges that the USEPA did not identify any human health risks from exposure to any use of glyphosate, but limited risks to mammals and birds and terrestrial and aquatic plants that could be addressed with additional mitigation and management practices dictated through revised labeling. We are pleased that USEPA has concluded that the “benefits outweigh the potential ecological risks when glyphosate is used according to label directions” and we are supportive of new label language to reduce drift potential, and preserve the efficacy of this important tool through new resistance management language.

Western Growers commends USEPA for their effort to preserve glyphosate as a viable tool for growers to combat weeds while at the same time enhancing ecological protection through new requirements for label language.

Respectfully,



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¹ Maibach, H. I. Irritation, sensitization, photoirritation and photosensitization assays with a glyphosate herbicide. *Contact Derm.* 1986, 15, 152-156.

² Endocrine Disruption Screening Program Weight of Evidence Conclusions on the Tier I Screening Assays for the List 1 Chemicals; U.S. Environmental Protection Agency, Office of Chemical Safety and Pollution Prevention, U.S. Government Printing Office, Washington, DC, 2015.

³ Glyphosate. Draft Human Health Risk Assessment in Support of Registration Review; U.S. Environmental Protection Agency, Office of Prevention, Pesticides and Toxic Substances, Office of Pesticide Programs, U.S. Government Printing Office: Washington, DC, 2017.

⁴ Giesey, J. P.; Dobson, S.; Solomon, K. R. Ecotoxicological risk assessment for Roundup herbicide. *Rev. Environ. Contam. Toxicol.* 2000, 167, 35-120.