



Indiana State Department of Agriculture

Governor Eric Holcomb

Lt. Governor Suzanne Crouch, Secretary of Agriculture and Rural Development

Bruce Kettler, Director

October 6, 2022

U.S. Environmental Protection Agency
The Honorable Michael Regan
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-001

RE: EPA-HQ-OPP-2013-0266-1622

Dear Administrator Regan:

I appreciate the opportunity to submit the following comments on the Environmental Protection Agency's (EPA) Proposed Revisions to the Atrazine Interim Registration Review Decision.

Indiana is the tenth largest farming state in the nation and is ranked fifth in production of corn. Our Hoosier farmers grow food for the world and to do so, they need access to safe, proven and cost-effective herbicides such as Atrazine. EPA's decision to reduce annual application rates and set the level of concern to 3.4 (ppb) is not based in science and contradicts the EPA's September 2020 decision which was the culmination of years of scientific review.

Furthermore, the proposed "picklist" system is complicated and will be difficult, if not impossible for, Indiana farmers to implement. The use of Atrazine has allowed farmers to adopt climate-smart practices, such as conservation tillage, which improves water quality and overall soil health. Without the use of this historically safe herbicide, farmers will need to combat weed pressure with the overall increased application of other herbicides and conventional tillage practices.

Atrazine has been a reliable and effective herbicide for almost 60 years. Before any changes are made, the EPA must conduct a Scientific Advisory Panel. Decisions must be based on sound-science and cannot be made arbitrarily or in a vacuum.

Thank you for the consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Bruce R. Kettler".

Bruce Kettler

Director, Indiana State Department of Agriculture