

**U.S. Environmental Protection Agency's FIFRA Scientific Advisory Panel:
"Draft Framework and Case Studies on Atrazine, Human Incidents, and
the Agricultural Health Study: Incorporation of Epidemiology and
Human Incident Data into Human Health Risk Assessment"**

**Comments from Jessica Johnson Bennett
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February 2, 2010

My name is Jessica Johnson Bennett, Director of Public Policy for the National Corn Growers Association (NCGA), and I appreciate the opportunity to testify before EPA's FIFRA Scientific Advisory Panel. I am providing comments on behalf of NCGA, which represents more than 36,000 members in 48 states, 47 affiliated state organizations and more than 300,000 corn farmers who contribute to state check-off programs across the country.

For more than 50 years, more than half of all American corn growers have relied on atrazine to protect our crops from a variety of grass and broadleaf weeds. We especially value its flexibility—atrazine can be applied to crops before, during or after planting. It can even be applied after the crop emerges.

By EPA's own estimate, atrazine saves corn farmers as much as \$28 an acre in reduced herbicide costs and increased yields. For all these reasons, atrazine is not just a good product. It is a vital product.

Atrazine not only supports corn production but also provides environmental benefits. Every farmer is, of necessity, a conservationist. We care deeply about our impact on the land and water and what we will leave behind for our children and grandchildren. That is why so many corn farmers are proud to rely on atrazine for no-till conservation agriculture on more than 44 million corn acres—a practice that is preventing soil erosion, protecting waterways and sequestering significant amounts of carbon dioxide across America.

It is with all these concerns in mind that our growers have been active participants in supporting the scientific approval of atrazine by the EPA over the last fifteen years under three administrations, both Democrat and Republican. We were there when EPA re-registered atrazine three years ago and concluded, as before, that the triazine herbicides pose "no harm that would result to the general U.S. population, infants, children or other major identifiable subgroups of consumers." We also invest confidence in the fact that the World Health Organization, the National Cancer Institute, and the British government all have studied atrazine and found no health concerns.

And yet—we now find ourselves facing an extraordinary, hastily assembled, and frankly unprecedented re-review of atrazine that seems to be inspired by anti-pesticide activists. We are troubled that this process seems rushed—and that the scientists on this SAP, who give so much of their time and expertise—are being asked to survey so much new data in so little time.

The good news is that we have seen time and again the quality and professionalism of EPA's scientific advisors. We are counting on you for a fair assessment based on sound science – and nothing but sound science. Thank you.