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MINNESOTA CORN GROWERS ASSOCIATION

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March 19, 2010

Gregg Regimbal, Supervisor
Minnesota Department of Agriculture, Pesticide Management Unit
625 Robert Street North
St. Paul, MN 55155-2538

Mr. Regimbal:

The Minnesota Corn Growers Association (MCGA) submits the following comments on the recently completed multi-agency registration review of atrazine. We appreciate the opportunity to provide input.

We concur with the primary conclusions of the report, specifically that "existing mitigation measures have contributed to reductions in concentrations of atrazine in Minnesota's water resources and to the prevention of occurrences of atrazine exposures above current state and federal health and environmental guidance." (page 11) Or more directly, the report shows that atrazine use in food production does not pose an unreasonable adverse risk to humans or the environment.

This report supports our belief that the current regime of regulatory and voluntary practices, combined with a targeted monitoring network for both surface and ground water, provides adequate and reasonable oversight of atrazine and other crop protection products.

We are concerned about duplication of resources in continuing to devote state funding and staff resources to reviews that are better conducted at the Federal level. Many of the uncertainties for which continued study is suggested arise from activist strategies to undermine the scientific process by which the USEPA and other agencies evaluate compounds like atrazine. While this may provide short term benefits, it is a make-work approach that detracts from the efficiency of the process without enhancing accountability. The USEPA has conducted several reviews of atrazine, and is in fact currently in the midst of such a review. The concerns about human health and environmental risks are more appropriately routed to the USEPA for consideration, freeing state agencies to monitor local conditions, work with farmers, and inform the public that "data from monitoring wells, examined by MDH and MDA for this review, indicate a historic decline in atrazine and its chloro-degradates to concentrations below health-based guidance" and that "private drinking water well survey results are also below health-based guidance." (page 10) We call for the state agencies involved to recognize and utilize, rather than duplicate, the resources and efforts of USEPA.



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MISSION STATEMENT

To promote opportunities for the profitability of corn farmers while enhancing quality of life.

We also request that the MDH and MPCA recognize the good work of the MDA in providing primary oversight of water monitoring programs while also coordinating the development and promotion of effective voluntary best management practices for atrazine.

Our organization strongly supports protecting Minnesota's natural resources and we appreciate this opportunity to comment. If you have any questions please contact me at (952)233-0333.

Best regards,

A handwritten signature in black ink, appearing to read 'Tim Gerlach', with a long horizontal flourish extending to the right.

Tim Gerlach, Executive Director
MN Corn Growers Association