

February 11, 2009

Environmental Protection Agency  
Office of Pesticide Programs (OPP)  
Regulatory Public Docket (7502P)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-001

Docket ID number EPA-HQ-OPP-2008-0877

The undersigned organizations submit these comments in response to the Petition filed with the agency to revoke all tolerances and cancel all registrations of 2,4-D.

We strongly urge the Environmental Protection Agency (EPA) to reject this petition and maintain 2,4-D as a highly effective crop protection product on the market. To a large degree, the questions and objections raised in the petition have been fully investigated and dealt with by the agency.

The EPA published the 2,4-D Reregistration Eligibility Decision (RED) in 2005 following a 17-year review process and found, among other issues, that the scientific quality for 2,4-D is high. Specifically, the 2,4-D bibliography contained a reference listing of 988 studies and published papers that were considered for reregistration and virtually no available data or public information was ignored. These studies show that 2,4-D is safe when used in accordance with label requirements. It should also be noted that in 2007, after more than 21 years of research, EPA concluded that no correlation exists between 2,4-D and human cancer.

2,4-D is one of the most widely used herbicides in North America and around the world. Health Canada, the World Health Organization and the European Union Commission do not consider 2,4-D to be carcinogenic. It is a broad spectrum herbicide that is economical for growers, and it is a key tool utilized in weed resistance management. Effective weed control in home, municipal and professional turf protects property values and provides safe playing fields.

An economic evaluation by the U.S. Department of Agriculture (NAPIAP Report 1-PA-96) concluded that the loss of 2,4-D would cost the U.S. economy \$1.7 billion annually in higher food production and/or alternative weed control expenses.

For all of the above reasons, we urge EPA to deny the NRDC petition given EPA's recent, scientific review of 2,4-D in the agency's June 2005 reregistration Eligibility Decision.

Sincerely,

Agriculture Retailers Association

American Farm Bureau Federation  
American Soybean Association  
American Sugarbeet Growers Association  
American Nursery & Landscape Association  
Beet Sugar Development Foundation  
California Citrus Quality Council  
California Dried Plum Board  
Cherry Marketing Institute  
Cranberry Institute  
Florida Citrus Mutual  
Idaho Potato Commission  
National Association of Wheat Growers  
National Agricultural Aviation Association  
National Corn Growers Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Potato Council  
USA Rice Federation  
Western Growers  
Wisconsin Crop Production Association