



Testimony of Jim Zimmerman

National Corn Growers Association

Before the Committee on Homeland Security and Governmental Affairs

U.S. Senate

August 17, 2016

Chairman Johnson, Ranking Member Carper, and members of the Committee:

Good afternoon, my name is Jim Zimmerman and I am board member for the National Corn Growers Association. I also serve as a director for the Wisconsin Corn Promotion Board. I would like to thank the Committee for inviting me to testify at this hearing on regulations affecting U.S. agriculture.

I'd like to begin my testimony by telling you a little bit about myself and my operation. I'm a Wisconsin grower with 2700 acres of corn, soybeans, and wheat, which are grown using no till and strip till, depending on the crop. I am a third generation farmer and I plan for my son Aaron to take over the farm one day. Every farming decision I make is motivated by what is best for the long-term viability of the farm. From the crops we grow to choices in tillage practices, everything is done with an eye on the future.

A key consideration for every farmer is which crop protection tools to use to ensure we raise a successful and healthy crop. One of the most important tools I use on my farm is the herbicide atrazine - and I am far from alone in this regard. Atrazine is one of the most widely used herbicides in the United States - used on well over half of corn and sorghum acres and on as much as 90% of sugar cane acres. Many specialty crops rely on the herbicide as well. Applying atrazine to control weeds allows farmers to use conservation tillage, a farming method that leaves the stubble or residue from the previous crop to cover the soil's surface after planting. According to United States Department of Agriculture, by leaving the crop residue and reducing or eliminating tillage trips, farmers are able to protect the soil from water and wind erosion, conserve moisture, reduce runoff, improve wildlife habitat and limit output of labor, fuel and machinery. In fact, conservation tillage reduces soil erosion by as much as 90 percent, compared to systems using intensive tillage. However, the elimination of tillage means that the farmer must rely on herbicides to control weeds. Atrazine is the most widely used herbicide in conservation tillage systems. Without atrazine, farmers would have to use higher quantities of other herbicides that are less effective while increasing tillage and threatening soil health and nutrients. This all impacts the bottom line.

Atrazine has been used in this country for more than 50 years. During that time, more than 7,000 scientific studies have been conducted on the safety of this herbicide to both

the environment and to humans. The evidence overwhelmingly confirms atrazine is safe. The World Health Organization and regulatory agencies in Australia, Canada, and the European Union have all come to the same conclusion. That is why NCGA was shocked to learn of EPA's findings in the preliminary ecological risk assessment that was released this past June as part of the standard 15 year rolling re-evaluation. Through the use of highly questionable studies, EPA arrived at an aquatic Level of Concern of 3.4 parts per billion, a two thirds reduction from the current level of 10. Scientific evidence points to a safe aquatic life Level of Concern at 25 parts per billion or greater. A Level of Concern of 3.4 is practically unachievable and would represent a de facto ban on the use of atrazine were it to become the standard.

EPA's conclusions rest on serious scientific errors and flawed interpretations, and are inconsistent with many of the Agency's previous conclusions and assessments by other regulatory agencies around the world. Several rigorous, high-quality scientific studies were discounted by the draft ecological risk assessment in favor of studies found flawed by EPA's own 2012 Scientific Advisory Panel (SAP).

By EPA's own estimate farming without atrazine would cost farmers an additional \$28 per acre. A 2012 University of Chicago study puts that number closer to \$60 per acre. A loss of atrazine would have an additional negative consequence in controlling herbicide resistant weeds. The National Corn Growers have advocated for farmers to implement multiple modes of action as the key part of weed resistance management. Atrazine is one of these essential modes that make this Best Management Practice possible.

If atrazine, one of the most studied herbicides with a proven track-record of over 50 years of safe use, is experiencing such difficulty in re-registration the future does not bode well for other crop protection tools. The cornerstone of our regulatory process must continue to be the best science and data. Flawed risk assessments like the one at hand threaten the integrity of the review and regulatory process as well as farmers' ability to maintain high crop yields and reduced soil runoff through the use of atrazine. NCGA and our farmer members are submitting comments to EPA on this document and we remain hopeful that EPA will return to a review process that is based on the best available science. The credibility of the Agency and the long-term sustainability of U.S. agriculture depends on it.

Again, I thank the committee for this opportunity to testify and for holding this hearing on a topic that is critically important to this nation's farmers.