



December 16, 2019

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

Re: Draft Human Health Risk Assessments for Paraquat; Docket ID EPA-HQ-OPP-2011-0855

The Illinois Corn Growers is pleased to submit comments in support of the reregistration of paraquat dichloride, commonly referred to as "paraquat," which is one of the most widely used herbicides in the U.S. Paraquat is an important tool that the Illinois corn farmers we represent need available to control weeds.

Paraquat is used on Illinois farmland as a broad-spectrum control option for weeds and grasses. It has a unique mode of action that is critical for developing sound herbicide resistant management programs where there are limited numbers of effective modes of action.

The Illinois Corn Growers Association is very interested in improving conservation practices on Illinois farms. Paraquat is an important tool to help us help farmers employ at least one new conservation practice on every acre in Illinois, which is our goal. Many farmers choose to plant cover crops as the additional conservation practice on their family farms and Paraquat is the herbicide used to control cover crops in certain cropping systems. Without it, farmers likely wouldn't choose to plant cover crops on their acres, impacting erosion, nutrient loss, and soil health.

Additionally, some farmers choose no-till or conservation tillage systems for their family farms, where Paraquat is also used to manage weeds. Again, not having Paraquat in the toolbox would negatively impact soil erosion and nutrient loss if these farmers opted against conservation tillage.

Where cover cropping systems and no-till systems are used, habitat for birds, mammals, and other wildlife is improved and overall biodiversity is greater.

Paraquat is a tool that empowers all these other conservation benefits on Illinois farms.

Thank you for the opportunity to comment. The Illinois Corn Growers Association supports the reregistration of Paraquat as a herbicide tool on Illinois farms.

Sincerely,

William L. Leigh
PRESIDENT