

## **APPENDIX 1-2. Commitment Letter from the Atrazine Registrants**

The Agency has received commitment letters from the technical registrants for atrazine: Adama; Drexel Chemical Company; Sipcam Agro USA, Inc. (on behalf of Sipcam Oxon S.p.A.), and; Syngenta. The technical registration identified and proposed voluntary label modifications that would reduce the scope and complexity of the biological evaluation for atrazine. Attached to this appendix are the technical registrants' commitment letters.



May 6, 2020

Document Processing Desk  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**Attention: Ms. Linsey Walsh, Chemical Review Manager  
Pesticide Re-evaluation Division, RMIB III**

**Subject: Proposed Atrazine Voluntary Label Modifications**

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, ADAMA understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA's Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. ADAMA further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA's biological evaluation and any subsequent consultations, ADAMA reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, ADAMA has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA's atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA's atrazine biological evaluation and any subsequent consultations. ADAMA has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. ADAMA has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.

Along with the other atrazine technical registrants, ADAMA will voluntarily request and accept the following label modifications for all atrazine registrations:

**ADAMA**

3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604 | Telephone 919-256-9357 | [www.adama.com](http://www.adama.com)



## ADAMA

- Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.
- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, ADAMA is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):<sup>1</sup>

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - From the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - From threatened and endangered species critical habitat and/or species locations. Bulletins Live (<https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins>) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

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<sup>1</sup> Brain R, Goodwin G, Abi-Akar F, Lee B, Rodgers C, Flatt B, Lynn A, Kruger G, Perkins D. 2019. Winds of Change, Developing a Non-Target Plant Bioassay Employing Field-Based Pesticide Drift Exposure: A Case Study with Atrazine. *Science of the Total Environment* 678:239–252. <https://doi.org/10.1016/j.scitotenv.2019.04.411>.



ADAMA

These label modifications would apply to all current ADAMA atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. ADAMA and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency's ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Kind Regards,

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

Jacob S. Moore  
Federal Regulatory Manager

ADAMA

3120 Highwoods Blvd. Suite 100 Raleigh, NC 27604 | Telephone 919-256-9357 | [www.adama.com](http://www.adama.com)



**Appendix 1: Current ADAMA Atrazine Product Registrations**

<b>Primary Product Name</b>	<b>Registration Number</b>
Atrazine Technical	11603-38
Atrazine 4L	66222-36
Atrazine 90DF	66222-37
Triangle Herbicide	66222-131
Parallel Plus	66222-132
MANA Atrazine 90DF	66222-229
ADA 68702	66222-280
ADA 68703	66222-281



## Drexel Chemical Company

May 5, 2020

Document Processing Desk  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**ATTENTION: Ms. Linsey Walsh, Chemical Review Manager  
Pesticide Re-evaluation Division, RMIB III**

### **Re: Proposed Atrazine Voluntary Label Modifications**

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, Drexel understands that EPA is conducting a nationwide assessment of the potential risks that use of Atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA's Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual Atrazine use locations and species locations. Drexel further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA's biological evaluation and any subsequent consultations, Drexel reviewed its Atrazine product registrations and labels and the relevant data regarding species locations and potential Atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific Atrazine uses in specific areas. Based on that review, Drexel has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA's Atrazine use locations analysis, the number of species whose range might overlap with Atrazine use sites, and the scope and complexity of EPA's Atrazine biological evaluation and any subsequent consultations. Drexel has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. Drexel has conferred with the other Atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.



Drexel

## Drexel Chemical Company

Along with the other Atrazine technical registrants, Drexel will voluntarily request and accept the following label modifications for all Atrazine registrations:

- Voluntarily label-off all uses of Atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as Atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.
- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - o Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - o Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - o Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

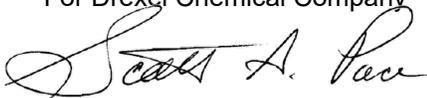
Along with the other Atrazine technical registrants, Drexel is also proposing and will accept the following label modifications for all Atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):<sup>1</sup>

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average wind speeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - o from the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - o from threatened and endangered species critical habitat and/or species locations. Bulletins Live (<https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins>) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

These label modifications would apply to all current Drexel Atrazine product registrations as listed in APPENDIX 1 to this letter, as well as any future Atrazine product registrations. Drexel and the other Atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency’s ongoing Atrazine endangered species risk assessment.

If you have any questions on these label modifications or related matters, we are willing and available to discuss them. Thank you.

Respectfully yours,  
For Drexel Chemical Company



Scott Pace  
Director of Registration

<sup>1</sup>Brain R, Goodwin G, Abi-Akar F, Lee B, Rodgers C, Flatt B, Lynn A, Kruger G, Perkins D. 2019. Winds of Change, Developing a Non-Target Plant Bioassay Employing Field-Based Pesticide Drift Exposure: A Case Study with Atrazine. Science of the Total Environment 678:239–252. <https://doi.org/10.1016/j.scitotenv.2019.04.411>.



**Drexel Chemical Company**

**APPENDIX 1: ATRAZINE PRODUCTS CURRENTLY REGISTERED BY DREXEL**

<b>EPA REG #</b>	<b>BRAND NAME</b>
19713-11	Drexel Atrazine 4L
19713-76	Drexel Atrazine 90 DF
19713-80	Atra-5
19713-171	Drexel Simazat 4L Herbicide
19713-291	Drexel Atrazine 5L Herbicide
19713-498	Drexel Atrazine 4F
19713-499	Drexel Atrazine 90DP
19713-513	Drexel Acetochlor Plus Atrazine
19713-547	Drexel Trizmet II
19713-553	Drexel Simazat 90DF
19713-565	Atrazine Technical 2
19713-566	Drexel Atrazine Technical
19713-567	Drexel Auguzine
19713-663	Drexel Trizmet Lite
19713-686	Drexel Trizar Herbicide
19713-688	Drexel TrizMax Herbicide



April 29, 2020

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Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**Attention: Ms. Linsey Walsh, Chemical Review Manager  
Pesticide Re-evaluation Division, RMIB III**

**Subject: Proposed Atrazine Voluntary Label Modifications**

Dear Ms. Walsh,

On behalf of Sipcaml Oxon S.p.A., Sipcaml Agro USA, Inc. offers the following proposal. As confirmed in the Atrazine Proposed Interim Registration Review Decision, Sipcaml Oxon S.p.A. (Sipcaml Oxon) understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA's Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. Sipcaml Oxon further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA's biological evaluation and any subsequent consultations, Sipcaml Oxon reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, Sipcaml Oxon agrees to the following voluntary label modifications that would significantly reduce the scope and complexity of EPA's atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA's atrazine biological evaluation and any subsequent consultations. Sipcaml Oxon agrees these label modifications for these reasons only, and not because of any consideration or determination whether the agreed upon uses actually pose any ecological risks, whether to listed species or otherwise. Sipcaml Oxon has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications listed below, and will confirm their commitment to do so in separate letters.



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Ms. Linsey Walsh  
April 29, 2020  
Proposed Atrazine Voluntary Label Modifications

Along with the other atrazine technical registrants, Sipcam Oxon will voluntarily request and accept the following label modifications for all atrazine registrations:

- Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.
- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, Sipcam Oxon is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):<sup>1</sup>

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
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<sup>1</sup> Brain R, Goodwin G, Abi-Akar F, Lee B, Rodgers C, Flatt B, Lynn A, Kruger G, Perkins D. 2019. Winds of Change, Developing a Non-Target Plant Bioassay Employing Field-Based Pesticide Drift Exposure: A Case Study with Atrazine. *Science of the Total Environment* 678:239–252. <https://doi.org/10.1016/j.scitotenv.2019.04.411>.



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Ms. Linsey Walsh  
April 29, 2020  
Proposed Atrazine Voluntary Label Modifications

These label modifications would apply to all current Sipcam Oxon atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. Sipcam Oxon and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency's ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Sincerely,

**Lizbeth Rea**  
**Director of Regulatory Affairs**  
**Sipcam Agro USA, Inc.**  
**US Agent for Sipcam Oxon Italia S.p.A.**



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Ms. Linsey Walsh  
April 29, 2020  
Proposed Atrazine Voluntary Label Modifications

**Appendix 1: Current Sipcaml Oxon S.p.A. Atrazine Product Registrations**

<b>Primary Product Name</b>	<b>Registration Number</b>
Oxon Italia Atrazine Technical II	35915-14
Atrazine 4L Herbicide	35915-4
Atrazine 90 Herbicide	35915-3



Regulatory Affairs  
P.O. Box 18300  
Greensboro, NC 27419-8300

April 17, 2020

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Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**Attention: Ms. Linsey Walsh, Chemical Review Manager  
Pesticide Re-evaluation Division, RMIB III**

**Subject: Proposed Atrazine Voluntary Label Modifications**

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, Syngenta understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA's Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. Syngenta further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA's biological evaluation and any subsequent consultations, Syngenta reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, Syngenta has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA's atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA's atrazine biological evaluation and any subsequent consultations. Syngenta has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. Syngenta has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.

Along with the other atrazine technical registrants, Syngenta will voluntarily request and accept the following label modifications for all atrazine registrations:

- Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
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- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, Syngenta is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):<sup>1</sup>

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - from the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - from threatened and endangered species critical habitat and/or species locations. Bulletins Live (<https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins>) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

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<sup>1</sup> Brain R, Goodwin G, Abi-Akar F, Lee B, Rodgers C, Flatt B, Lynn A, Kruger G, Perkins D. 2019. Winds of Change, Developing a Non-Target Plant Bioassay Employing Field-Based Pesticide Drift Exposure: A Case Study with Atrazine. *Science of the Total Environment* 678:239–252. <https://doi.org/10.1016/j.scitotenv.2019.04.411>.

These label modifications would apply to all current Syngenta atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. Syngenta and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency's ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Kind Regards,

A handwritten signature in cursive script that reads "Cheryl Moore".

Cherilyn Moore  
Regulatory Product Manager

## Appendix 1: Current Syngenta Atrazine Product Registrations

<b>Primary Product Name</b>	<b>Registration Number</b>
AAtrex 4L Herbicide	100-497
AAtrex Nine-O Herbicide	100-585
Acuron Herbicide	100-1466
Atrazine 4L MUP	100-1650
Atrazine Base Mix Manufacturing Use Product	100-1235
Atrazine Nine-O MUP	100-1659
Atrazine Technical	100-1207
Atrazine Wet Paste Manufacturing Use Product	100-1236
Bicep II Magnum Herbicide	100-817
Bicep II Magnum Manufacturing Use Product	100-1214
Bicep Lite II Magnum Herbicide	100-827
Bicep Lite II Magnum Manufacturing Use Product	100-1213
Bicep Magnum	100-886
Callisto Xtra Herbicide	100-1359
Expert Herbicide	100-1161
Lexar EZ Herbicide	100-1414
Lumax EZ Herbicide	100-1442
SYN-A17227 Herbicide	100-1356