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April 30, 2018

Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Glyphosate Registration Review, Docket No. EPA-HQ-OPP-2009-0361

Dear Administrator Pruitt:

The US Canola Association (USCA) writes to submit comments regarding the registration review of the herbicide glyphosate, Docket ID No. EPA-HQ-OPP-2009-0361. The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. Since USCA's establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to over 2 million acres in 2017.

USCA appreciates the opportunity to offer comments supporting the continued registration of glyphosate, one of the more widely used herbicides for the control of annual and perennial weeds in the U.S. The registration of glyphosate in the 1970s enabled the rapid adoption of conservation tillage practices, such as no-till and minimum till, that have benefited both the public and producers through reduced soil erosion and fuel consumption. USDA's National Resources Inventory has found that conservation tillage practices have been adopted on up to 91 percent of planted acres in some regions of the country; and that wind and water erosion has been reduced by 64 and 61 percent respectively. Additionally, reduced fuel consumption since the availability of glyphosate has dramatically reduced CO2 emission on US farms.

Should glyphosate fail to be re-registered for use, USCA is concerned that farmers would have to either begin using more toxic herbicides with much higher residual rates – glyphosate is neutralized when it comes in contact with soil – as well as revert to traditional erosive tillage practices, both of which would have negative effects on the environment. The aforementioned gains in reducing wind and water soil erosion would be negated and would place in question the sustainability of our food production system.

The USCA is encouraged that the EPA is looking at science-based decision-making in evaluating glyphosate, and urges the Agency to use the overwhelming data that supports the continued registration of glyphosate.

Respectfully yours,

Rob Rynning
President, U.S. Canola Association