



North American Millers' Association
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June 5, 2019

Electronic Submission

OPP Docket
Environmental Protection Agency Docket Center (EPA/DC)
Mail Code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Docket No. EPA-HQ-OPP-2019-0066; *Glyphosate: Environmental Working Group Petition to Reduce the Glyphosate Tolerance on Oats and Prohibit Preharvest Use on Oats (May 6, 2019)*

Dear Sir or Madam:

The North American Millers' Association (NAMA) would like to take this opportunity to submit comments in response to the Environmental Protection Agency (EPA) request for comment on the Environmental Working Group (EWG) petition to reduce the glyphosate tolerance on oats from 30 parts per million (ppm) to 0.1 ppm and prohibit preharvest use on oats. We believe the EPA needs to look no further than its announcement¹ and proposed decision of April 30 for the science-based justification to reject the EWG petition.

NAMA is the trade association representing the wheat, corn, oat, and rye milling industry. NAMA's member companies operate over 160 mills in 38 states and Puerto Rico. NAMA members take raw grain and, through grinding and crushing, create flour and other products that are used to make such favorite foods as bread, pasta, cookies, cakes, oatmeal and snack foods. NAMA member companies represent more than 90 percent of total industry production capacity.

The health and safety of our consumers is the top priority for the milling industry as we deliver safe, nutritious, convenient, and affordable milled grain products to hundreds of millions of people around the world every day. To successfully achieve that goal, the grain value chain uses numerous strategies, such as conventional farming practices, that help farmers reduce their environmental footprint while producing a high yielding, higher quality crop. It is important to note that the milling industry does not use or add glyphosate at any point during the milling process.

¹ EPA Takes Next Step in Review Process for Herbicide Glyphosate, Reaffirms No Risk to Public Health (April 30, 2019) <https://www.epa.gov/newsreleases/epa-takes-next-step-review-process-herbicide-glyphosate-reaffirms-no-risk-public-health>

While products such as glyphosate are viewed as a critical tool for producers in their farming operations, it is important that the proper regulatory bodies, such as the EPA, review and establish the safety of a product like glyphosate. NAMA fully supports the proper use and application of glyphosate by growers as established by EPA. Any modification of the tolerance levels needs to be thoroughly reviewed and science-based.

We are concerned the EWG petition lacks the broad scientific support to justify such a significant change in the tolerance level for oats. The petitioners claim that glyphosate is a possible carcinogen and that the current 30 ppm glyphosate tolerance on oats is not adequately protective of children. As stated in the Proposed Interim Registration Review Decision on Glyphosate², current glyphosate tolerances established in 40 CFR §180.364 range up to 400 ppm. The EPA evaluated the glyphosate residue chemistry database to determine if the established tolerances conform to current practices and to determine whether updates were necessary for current crop group/subgroup definitions. While the EPA intends to establish new tolerances for various vegetable and fruit groups and subgroups, oat was not identified as a commodity requiring a change to its tolerance level as suggested in the petition.

Furthermore, EPA has stated³ there is no risk to human health from current uses of glyphosate when following label directions. Importantly, the Agency has also found that glyphosate does not exceed the level of concern for children 1-2 years old, the most highly exposed population subgroup to glyphosate. This finding is also consistent with several international expert panels and regulatory authorities such as the Canadian Pest Management Regulatory Agency, Australian Pesticide and Veterinary Medicines Authority, European Food Safety Authority, European Chemicals Agency, German Federal Institute for Occupational Safety and Health, New Zealand Environmental Protection Authority, and the Food Safety Commission of Japan.

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NAMA strongly believes in the importance of producing safe, milled grain products that can be used by our customers to make a variety of wholesome foods that consumers know and love. We appreciate the opportunity to submit these comments. Should the agency have any further questions regarding our comments or if any additional information may be helpful, feel free to contact us at 202-484-2200 or jmccarthy@namamillers.org.

Sincerely,



James McCarthy
President and CEO

² Docket Number EPA-HQ-OPP-2009-0361 – Glyphosate: Proposed Interim Registration Review Decision Case Number 0178 (page 24) (April 2019) <https://www.epa.gov/sites/production/files/2019-04/documents/glyphosate-pid-signed.pdf>

³ www.epa.gov – Ingredients Used in Pesticide Products: Glyphosate