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March 23, 2018

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

**RE: Registration Review: Draft Human Health and/or Ecological Risk Assessments  
for Several Pesticides; Docket ID No. EPA-HQ-OPP-2009-0361**

Dear Sir or Madam:

On behalf of the American Soybean Association (ASA), I am writing to provide comments on the registration review of glyphosate, Docket ID No. EPA-HQ-OPP-2009-0361. ASA represents all U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean producing states.

As producers, we want to be able to continue to grow safe and affordable food so that we can feed an estimated 9.7 billion people by 2050. Pesticides are only one of the tools we use to do that, but they are important. With the right products available like glyphosate, producers can reduce soil erosion through no-till and conservation tillage practices and as a result, make a more affordable product while reducing impacts to the environment.

As the EPA reviews the registration of glyphosate, ASA believes it is important to take into consideration the value of this herbicide for soybean growers and its contribution to making agriculture more sustainable. We would also like to stress the importance of an efficient and timely regulatory process, particularly in the case of glyphosate, an herbicide with a long history of safe use. Scientific studies conducted over several decades have overwhelmingly shown that when used according to label directions, glyphosate does not present an unreasonable risk of adverse effects to humans, wildlife or the environment. The EPA has supported the safe use of glyphosate for more than 40 years.

We applaud the publication of the Office of Pesticide Program's September 12, 2016, "Glyphosate Issue Paper," which concludes that, "The strongest support is for "not likely to be carcinogenic to humans" at doses relevant to human health risk assessment." The EPA again made an announcement on December 18, 2017 after the draft human health risk assessment that concluded that glyphosate is not likely to be carcinogenic to humans. According to the announcement, "The Agency's assessment found no other meaningful risks to human health when the product is used

according to the pesticide label. The Agency's scientific findings are consistent with the conclusions of science reviews by a number of other countries as well as the 2017 National Institute of Health Agricultural Health Survey."

ASA strongly supports biotechnology and believes the development of biotechnology-enhanced soybean varieties and products can benefit farmers, consumers, and the environment. Glyphosate-tolerant soybeans have enabled soybean farmers to better control weeds and implement no-till and conservation tillage practices that save fuel, reduce erosion, and protect the environment. Over 95% of soybeans grown in the U.S. are estimated to be herbicide-tolerant and the majority, around two-thirds, of U.S. soybean farmers practice conservation tillage. In the past, many soybean farmers would cultivate their crop as many as three or four times during the growing season, increasing soil erosion as well as carbon dioxide emissions caused by a higher number of passes through a field.

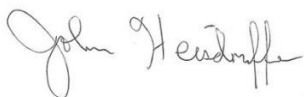
By contrast, no-till practices require just one pass to plant the seeds, saving farmers hundreds of hours of labor. Glyphosate enables effective weed control with no harmful residues in no-till settings, while allowing farmers more flexibility in application timing. Without access to glyphosate, soybean farmers will have to use other herbicides, which may leave residues that could harm our crops or increase the amount of tillage and labor to control weeds.

Glyphosate has played a key role in helping farmers manage weeds that can rob crop yields and quality and has resulted in the widespread adoption of glyphosate-tolerant soybeans in the United States. Farmers have seen significant benefits since the adoption of herbicide-tolerant soybeans, the majority of which are made up of glyphosate-tolerant soybeans.

ASA believes it is critical that the EPA operate a timely, efficient, predictable, and science-based regulatory system, which is critical to keeping U.S. soybean farmers productive, sustainable, and competitive. We encourage the Agency to conduct a timely and science-based review of glyphosate that takes into account the decades of research demonstrating the safety of this herbicide and the important benefits it brings farmers.

On behalf of America's soybean farmers, thank you for the opportunity to comment.

Sincerely yours,

A handwritten signature in black ink that reads "John Heisdorffer". The signature is written in a cursive style with a large, looped initial "J".

John Heisdorffer  
President