



Integrated Plant Protection Center
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August 5, 2016

Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001

Re: EPA-HQ-OPP-2013-0251-0035, simazine registration review

The following comments are submitted regarding the registration review of the active ingredient simazine. These comments are being submitted on behalf of the Western IPM Center, and are intended to provide general usage information from the Pacific Northwest region.

Simazine is a widely used herbicide in the Pacific Northwest. This product is used in berries, tree fruits, and many other perennial crops as pre-emergence control for grass and broadleaf weeds. It is considered a highly effective herbicide, although many industries are aware of this product's resistance issues and aquatic risks and have requested research on and registration of alternatives through the Pest Management Strategic Plan (PMSP) process. While some alternatives now exist, such as Alion (indaziflam) and Chateau (flumioxazin), these products are two or three times the cost of simazine, which is a key barrier to transition away from this product.

When used in rotation with other classes of herbicides, simazine is considered an important tool for managing resistance, as it is one of the few broad-spectrum pre-emergent herbicides available to growers from the herbicide mode of action of group 5, and offers another mode of action that diversifies selectivity. However, its overuse has led to resistant weed species in some fields in the Pacific Northwest.

Simazine and atrazine are both designated as pesticides of concern for water quality in the state, and are part of a surface and ground water monitoring program overseen by a state inter-agency team that includes the Oregon Department of Environmental Quality, Oregon Department of Forestry, Oregon Department of Agriculture, Oregon Watershed Enhancement Board and Oregon Health Authority. Both compounds, or their degradates, are very prevalent in multiple watersheds, and both have been found to exceed their respective EPA aquatic life benchmarks over recent years. In addition, multiple surface water detections of these compounds have been observed at levels approaching the EPA benchmarks (i.e., between 50%-100% of the benchmark value). This demonstrates that off-target



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movement is a concern with these products, despite labeling and other efforts to limit this problem.

Registration of affordable alternatives to simazine would reduce resistance and aquatic risks, and meet documented grower demands for alternatives to this product.

Respectfully,

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