



**NATIONAL SORGHUM PRODUCERS
ENVIRONMENTAL COMMENTS**

Presented to:

Rural American Solutions Group

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Presented by:

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My name is Gerald Simonsen. I am a sorghum, soybean, corn and cattle producer from Ruskin, Nebraska. I work 1600 acres on my fourth-generation family farm, and serve as Chairman of the National Sorghum Producers, representing American farmers who produce grain that is an important ethanol feedstock and animal feeding component.

I am grateful to have this opportunity to add my voice to the mounting alarm about what is happening today to the American farmer, who increasingly feels himself under attack by a regulatory assault coming out of Washington.

Thoughtful, science-based regulation is of course critical, and the American farmer – who lives as close to the land as you can get – has always been a full partner in the responsible stewardship of our environment. But what we see in Washington today is entirely different: a hyperactive regulatory machine stuck in high gear and blind to the economic pain it is causing America's heartland.

In less than two years, Washington regulators at the EPA and other agencies have opened up, sped up, or tightened up regulatory reviews and restrictions concerning everything from Clean Water Act requirements for pesticide applications, to greenhouse gases, to plain old dust on America's farms.

Among the more burdensome red tape coming out of EPA are rules on pesticide spray drift. Policies have long acknowledged that small levels of pesticide drift is unavoidable and, when used according to the product's label, do not hurt the environment. However, anti-pesticide litigation is pushing EPA and the states to consider zero-drift policies. EPA is planning to apply this new spray drift language to pesticide labels. Speaking for the farmer, I can tell you that this opens the door to frivolous lawsuits and enforcement actions against farmers and other applicators. And the catch is it results in little or no measurable environmental benefit.

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Then there's the Clean Water Act *NPDES* permit issue. This permit will add performance, recordkeeping and reporting requirements to an estimated 1.5 million pesticide applications per year. Never in the 62 years of FIFRA or 38 years of the Clean Water Act has the federal government required a permit to apply pesticides "to, over or near" waters of the U.S. for control of certain pests. Congress omitted pesticides in 1972 when it enacted the CWA *NPDES* program, and despite major rewrites since, never looked beyond FIFRA for the regulation of pesticides.

There are many other regulations hatching at EPA. But I'd like take this opportunity to talk about one more in particular: EPA's targeting of one of the most essential tools in the farmer's toolbox today – atrazine.

Two-thirds of our sorghum acreage is grown with the help of atrazine, and in many cases there is no viable alternative, unless you want us all to return to hand weeding. More than half of all corn farmers and almost all sugar cane growers rely on atrazine as well.

EPA itself estimates that losing atrazine would cost corn growers \$28 an acre. But that's an old number and almost certainly underestimates the damage of removing this essential herbicide from the shelves. Earlier this year, University of Chicago economist Don Coursey updated the analysis and found that banning atrazine would cost corn growers as much as \$58 an acre and destroy as many as 48,000 jobs.

That figure is only related to corn production, the number would be much higher if you count in sorghum, sugar and all the fruits, nuts and other crops that are grown with sister products, such as simazine.

In 50 years atrazine has probably been studied more than any other crop protection product on the planet. Just recently, in 2006, EPA completed an extensive 12-year review drawing on files that contain some 6,000 studies, and gave atrazine a clean bill of health.

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That is the same conclusion reached by many other governments, including Great Britain, Australia, and Canada. Just a few days ago, the World Health Organization confirmed that atrazine is safe at 100 parts per billion—although we regulate it in this country at 3 parts per billion.

Despite the overwhelming weight of scientific opinion testifying to atrazine’s safety, however, EPA decided last year to institute an irregular and unprecedented re-review of the substance. Incredibly, the reason they gave was a new report by the NRDC -- an activist organization with a well-known anti-pesticide agenda – and news stories by the activists’ friends in the media.

This strange inversion of the normal deliberative process is not going unnoticed by farmers. And as a result, it is not going unnoticed by Members of Congress in both parties.

Last week, Members of the Senate Agriculture Committee told EPA Administrator Lisa Jackson that the American farmer feels as if EPA has it in for us. Senator Blanche Lincoln said that “farmers and ranchers...all over our nation are increasingly frustrated and bewildered by vague, overreaching and unnecessarily burdensome EPA regulation.” She called for “clear, straightforward and predictable rules to live by that are not burdensome, duplicative, costly, unnecessary, or, in some cases just plain bizarre.”

The treatment of atrazine is the most bizarre move of them all, one that seems to have little to do with science, and a lot to do with activist politics.

The larger issue before the Members of this House is why is this being done to us? Why has an American agency decided to declare regulatory war on such a large swath of American people? And what can we do to restore reason to this process?

We’re here today because we need your help – the help of our elected leaders in Congress – to stop this regulatory run-away train before it causes irreparable damage to America’s heartland by raising our cost of production and making American farmers uncompetitive in the world marketplace.

Thank you.