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UNITED STATES OF AMERICA  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR



In re: )  
          ) )  
2,4,5-Trichlorophenoxy- ) I. F. & R. Docket No. 295  
acetic Acid )

RESPONSE OF THE SECRETARY OF AGRICULTURE TO THE  
ISSUES TO BE DISCUSSED IN THE ADMINISTRATIVE  
HEARING CONCERNING THE HERBICIDE 2,4,5-T

In a notice of intent to hold a hearing with respect to the herbicide 2,4,5-T (38 F.R. 19860), the Assistant Administrator for Hazardous Materials Control instructed "that any person wishing to become a party to this hearing called by me today on all other uses of 2,4,5-T shall file a response to the accompanying statement of issues . . . ." The aforesaid notice then specified four issues to be addressed at the above-captioned administrative hearing concerning the use of the herbicide 2,4,5-T. Accordingly, and in compliance with the above-mentioned requirement, the Secretary of Agriculture of the United States (hereinafter referred to as the Secretary) is providing this serial response to the questions posed.

We believe that 2,4,5-T as presently registered is an indispensable tool in providing the Nation with its necessary supply of

food, fiber, and timber safely and economically. It is also essential to the clearing and maintenance of important rights-of-way vital to transportation and energy in this country. We intend clearly to establish at this hearing that the use of 2,4,5-T on rights-of-way, rice crop land, pasture and range land, and forest land provides not only an effective and economical control of herbaceous weeds and brush, but also 2,4,5-T provides such control without endangering human health and without unreasonable adverse effects on the environment.

Question 1. Whether 2,4,5-T products presently registered, or other materials submitted in support of these registrations complies with the provisions of Federal Insecticide, Fungicide, and Rodenticide Act, as amended.

Section 3(c)(5) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, reads in part:

The Administrator shall register a pesticide if he determines that, when considered with any restrictions imposed under subsection (d) -

(C) it will perform its intended function without unreasonable adverse effects on the environment; and

(D) when used in accordance with widespread and commonly recognized practice it will not generally cause unreasonable adverse effects on the environment.

As will be discussed more fully in responding to questions 2 and 3, we believe that 2,4,5-T does comply with the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, in that it will perform its function without unreasonable adverse

effects on the environment, and when used in accordance with widespread, commonly recognized practice, does not generally cause unreasonable adverse effects on the environment.

Question 2. Whether 2,4,5-T will perform its intended function without unreasonable effects on the environment.

We believe the herbicide 2,4,5-T will perform its intended function without unreasonable adverse effects on the environment. 2,4,5-T is a herbicide used for over 20 years to control herbacious weeds and brush. It has been used effectively for years in the United States for weed control on pasture and range land, rights-of-way, rice crop land, and forest land.

2,4,5-T can be used to control a number of weeds in rice, but its main need is on curly indigo, a serious weed problem in rice. It is also used on duck salad at four to six weeks after rice seedling emergence but well before flowering. 2,4,5-T is most effective because of its superior control of curly indigo, and it is preferred over other phenoxy herbicides because of its less deleterious effect on neighboring crops.

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2,4,5-T is effective in the control of some ninety species of woody weeds on range land, forest land, and rights-of-way. Only about one-half of the woody plants controlled by 2,4,5-T can be controlled by sprays of 2,4,-D. There are no unreasonable adverse effects on the environment when the herbicide 2,4,5-T is properly applied for the control of woody weeds on range land, forest land, and rights-of-way.

In studies involving areas of the United States where 2,4,5-T is commonly used, it has been found that 2,4,5-T is not persistent in the environment, it does not bioconcentrate, and there are no known health-related problems caused by its use. Any concentrations of 2,4,5-T found in the air, food, or water were far below biologically significant levels; and at such levels, 2,4,5-T has no adverse effects on humans or animals.

Question 3. Whether, when used in accordance with widespread and commonly recognized practice, 2,4,5-T generally causes unreasonable effects on the environment, as defined by the Federal Insecticide, Fungicide, and Rodenticide Act, as amended.

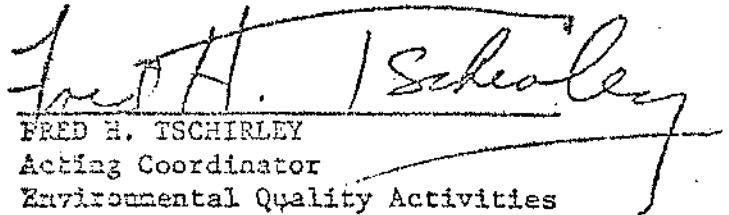
As stated earlier, the herbicide 2,4,5-T is commonly used to control herbacious weeds and brush on pasture and range land, rights-of-way, rice crop land, and forest land. The herbicide is applied in liquid form as a diluted spray and at a rate and manner which are environmentally safe.

2,4,5-T provides a low cost, effective control of herbacious weeds and brush, thereby contributing substantially to the production of a reasonably priced food, timber, fiber, and energy supply in the United States. If the use of 2,4,5-T were to be restricted, the result would be additional costs of many millions of dollars to farm and nonfarm users. It is reasonable to expect that the ensuing increased production costs would eventually be passed on to the consumer in the form of higher prices for, and shortages of, food, fiber, timber, and energy.

Question 4. Whether the registrations of 2,4,5-T should be canceled or its classification changed.

In view of the evidence presently available, coupled with the anticipated testimony and documents to be adduced, we do not believe the present registrations for the use of the herbicide 2,4,5-T on rice crop land, pasture and range land, forest land, and rights-of-way should be canceled, nor should its classification be changed. It is our belief that these uses fully comply with the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended.

Respectfully submitted,

  
FRED H. TSCHIRLEY  
Acting Coordinator  
Environmental Quality Activities