

May 8, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Submitted electronically

Dear Administrator Wheeler,

As the Environmental Protection Agency (EPA) continues its work on the conditional registration review for the use of dicamba on dicamba-tolerant crops, we wanted to offer perspective from growers – who are the primary users of the product – to help inform the agency’s review efforts. Like many stakeholders, we agree there have been and continue to be off-target challenges with dicamba use. However, we have seen the beneficial impacts brought by EPA’s label revisions, coupled with improved education efforts taken by the agency, research and extension personnel, grower groups, retailers, and registrants. These steps have had a significant impact in mitigating off-target incidences as popularity of the product grows. To that end, we believe the benefits of the continued availability of dicamba for use on dicamba-tolerant crops greatly outweigh existing risks. We strongly encourage the agency’s continued work towards a longer-term registration of dicamba on dicamba-tolerant crops for over the top application, accompanied by practical and detailed label requirements, and assertive training to continue to minimize risks.

As a whole, U.S. agriculture has significantly benefited from the availability of dicamba on dicamba-tolerant crops since EPA first approved the product for conditional registration in 2016. In recent years, the emergence of weeds resistant to nearly all other registered chemistries – such as Palmer Amaranth, Tall Waterhemp, Ragweed, and Italian Ryegrass – have inflicted billions of dollars in losses to U.S. growers lacking effective post-emergence weed control tools. Dicamba for use on dicamba-resistant cotton and soybeans, combined with effective Integrated Pest Management plans, have offered producers an effective new tool to control these persistent and damaging weeds. As a testament to their effectiveness and popularity with growers, USDA’s Economic Research Service reports use of dicamba-resistant seeds increased 43 percent from 2016 to 2018.¹ It is critical that growers continue to have access to this tool in a predictable, longer-term manner for future growing seasons.

As important as this tool has been for agricultural producers, like with all crop protection tools, we support the safe and responsible use of dicamba to minimize unintended impacts. We value EPA’s continued work in assessing the label to prevent off-target occurrences and abating the emergence of weed varieties resistant to this chemistry. While we have seen the benefit brought

¹ Wechsler, Seth J., David Smith, Jonathan McFadden, Laura Dodson, Sam Williamson. October 1, 2019. “The Use of Genetically Engineered Dicamba-Tolerant Soybean Seeds Has Increased Quickly, Benefiting Adopters but Damaging Crops in Some Fields”. Accessed May 5, 2020. <https://www.ers.usda.gov/amber-waves/2019/october/the-use-of-genetically-engineered-dicamba-tolerant-soybean-seeds-has-increased-quickly-benefiting-adopters-but-damaging-crops-in-some-fields/>

by a more thorough label and greater education – which have helped to mitigate the number of off-target incidents as the popularity of this tool has grown – we are committed to working with you and other agricultural stakeholders to continue to reduce these risks. Additionally, we are eager to partner with EPA and other pest management experts in crafting plans to inhibit the emergence of weeds resistant to this valuable chemistry so that it may continue to effectively serve U.S. agriculture for years to come.

We thank you for your continued work on the review of the conditional registration of dicamba for use on dicamba-tolerant crops. Please consider us as resources and partners as EPA continues this important effort.

Sincerely,

American Soybean Association
National Cotton Council