

September 28, 2021

The Honorable Michael Regan
Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Cc: Filed electronically at Regan.Michael@epa.gov

RE: Dicamba Herbicide Product Registration

Dear Administrator Regan,

The undersigned coalition of Kansas agricultural stakeholders represents cotton and soybean farmers, agribusiness, biofuels industry, and conservationists that seek the continued use of over-the-top (OTT), post-emergent application of dicamba herbicide products.

Kansas is a leading producer in agricultural commodities. Regulatory actions affecting use or access to crop protection inputs, such as dicamba, directly impact the ability of agricultural producers to successfully control weeds.

When used in accordance with EPA-approved label directions, OTT dicamba herbicide has proven to be very effective in the production of soybeans and cotton in Kansas. In fact, use dicamba herbicide on dicamba-tolerant crops has become an essential part of controlling post emergent weed growth and ensuring that crops are able to make use of the available water and nutrients in the soil. This allows the plant to maximize yield potential, and optimizes overall production efficiency, decreasing the need for water and fertilizers.

Dicamba also broadens the spectrum of weed species control and weed resistance management. Additionally, use of dicamba often reduces the need for potentially less safe alternative herbicides which may require multiple applications.

Use of products like dicamba allow for the sustainability of agricultural crop production. In Kansas, where drought conditions often persist, preserving moisture levels in soil is critical. Conservation tillage allows farmers to disturb less soil, and reduce soil erosion and carbon emissions. Use of dicamba herbicide allows more Kansas farmers to adopt "no-till" and other conservation tillage methods which diminish soil compaction, preserve soil moisture, and reduce energy used by limiting the number of times tractors traverse farm ground.

Use of dicamba herbicide enhances the quality and quantity of agricultural commodities grown in Kansas. The entire Kansas agricultural industry and economy would suffer harm from increased restrictions on the use of this herbicide product.

We are requesting that the agency provide regulatory certainty and ensure continued access to these products under the 2020 approved label. We would also seek state level flexibility on use and cut-off dates as necessary to meet the needs and growing conditions present in each state and region.

As crop rotation and input decisions for next year are being made by agricultural producers now, it is important that growers have timely notice of what herbicide products will be available during the 2022 growing season.

Thank you for the opportunity to submit these comments.

Respectfully,

Kansas Farm Bureau
Kansas Soybean Association
Kansas Cotton Association
Kansas Cooperative Council
Kansas Agribusiness Retailers Association
Renew Kansas Biofuels Association
Kansas Association of Conservation Districts
Kansas Grain and Feed Association