



1156 15TH Street, NW · Suite 500 · Washington, DC 20005
T 202.457.0825 · F 202.457.0864 · www.aradc.org

May 31, 2016

Dicamba: New Use on Herbicide-Tolerant Cotton and Soybeans
Environmental Protection Agency
Mailcode 28221T
1200 Pennsylvania Ave, NW
Washington, DC 20460

Regarding Docket No. EPA-HQ-OPP-2016-0187

On behalf of the Agricultural Retailers Association (ARA), I submit the following comments in regards to the U.S. Environmental Protection Agency's (EPA) registration review process for new dicamba formulations for use on USDA deregulated dicamba-tolerant cotton and soybeans.

Statement of Interest

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

Comments

Weed resistance continues to be a growing issue which impacts the ability of both cotton and soybean farmers to produce strong yields. The new dicamba formulations, in combination with dicamba-tolerant soybeans and cotton, will enable farmers to continue to successfully manage resistant weeds and effectively steward the land. There are limited options for selective postemergence broadleaf weed control in both crops. Dicamba is a tool for managing resistance to multiple herbicide modes of action. These new formulations will support conservation tillage by allowing postemergence weed control to difficult to control weeds in no-till and minimum-till soybeans and cotton. If approved, dicamba's wider application window provides greater flexibility in weed control.

Tank mixes are needed because dicamba should not be used as a stand-alone weed control solution. These products should be used in an integrated weed management system with other herbicides. Resistance to dicamba will be mitigated in part due to the fact it will be used in conjunction with either glyphosate or glufosinate. Farmers will provide additional controls through management practices and controls they use such

as crop rotation, row spacing, cover crops, scouting for weeds, and mechanical means to prevent weeds.

Large buffers will limit the potential for using dicamba to control glyphosate resistant weeds. Large buffers in all directions around the field make dicamba use impractical. The new formulations under consideration are an improvement over first-generation products. Like any other herbicide, off-site movement of dicamba can be minimized through proper stewardship including use of new precision agriculture technologies and techniques. EPA risk assessments seem to overestimate offsite movement in light of these new technologies. Wind-directional buffers along with label stewardship measures are adequate to reduce drift potential in nearby crops.

Dicamba is needed to keep agricultural productivity on pace to meet both domestic and global demand. It is also a vital tool to ensure viable cropping alternatives remain available. A failure to approve dicamba may place American agriculture at a disadvantage to competitors in other countries.

Thank you for your review and consideration of these comments.

Sincerely,



Richard D. Gupton
Senior Vice President, Public Policy & Counsel