



August 24, 2018

The Honorable Andrew Wheeler  
Acting Administrator  
US Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Mail Code: 1101A  
Washington, DC 20460  
Transmitted via electronic mail

RE: 2019 label decision for dicamba products

Dear Mr. Wheeler,

The Agricultural Retailers Association (ARA) represents suppliers of agronomy products and services to America's farmers. As such, our members have been very close to the issue of dicamba use on tolerant crops over the past two years. We understand that the Agency may be making its decision soon on the 2019 label for dicamba, and we wanted to provide our perspective to you as this decision is contemplated.

Dicamba technology is an effective tool in dicamba-tolerant cropping systems with a good residual herbicide program. Noxious weeds that have become resistant to other control tools are controlled quite effectively by this product. If the product were to be removed from farmers' toolkits, equally effective alternatives are not available. A return to hand-weeding these difficult weeds is not out of the question and is not a practical solution. We would like to see a way forward to continue use of this technology.

However, the number of damage claims and complaints over the last two years cannot be sustained. Claims need to be fully yet expediently investigated so the legitimate ones can be addressed and any frivolous ones dismissed. Off-target movement due to volatility or temperature inversions remain real concerns even when the product labels are followed to the letter. Continued research and innovation to minimize these risks must be pursued by product manufacturers. Our member companies are highly responsive to the label requirements and have trained their applicators extensively on how to follow the label and best steward these products. Even under the best conditions and perfect label compliance, off-target movement has occurred; manufacturers must seek further improvements to minimize these risks.

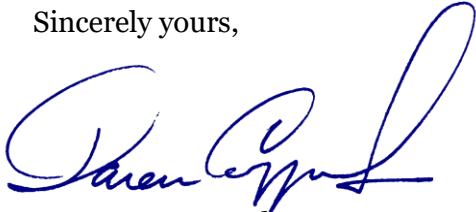
The label for 2018 and 2019 had many restrictions intended to minimize off-target movement. In many cases these restrictions prevented application during most of the days of the spring spray season due to insufficient or excess wind. Should EPA feel additional label restrictions are necessary for 2019, we prefer those restrictions be based on crop growth stage (such as V stage

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soybeans), weed size, temperature or other variables that are tied to the growing season rather than fixed calendar dates. No one growing season is like another – a set of calendar dates may be too early one year and too late the next.

Thank you for the scientific rigor with which the Office of Pesticide Programs has evaluated this situation. If there is anything our association can do to assist you in this process, please don't hesitate to contact us.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Daren Coppock". The signature is fluid and cursive, with a large loop at the end.

W. Daren Coppock  
President & CEO

Cc: Rick Keigwin, Ruben Baris (via electronic mail)