

June 5, 2020

Alex Dunn
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 7101M
Washington, DC 20460

Re: June 3rd 9th Circuit Decision related to Dicamba Labels

Ms. Dunn:

The agricultural industry awakened yesterday morning to a crisis situation due to the court vacatur of specific dicamba herbicides. We are disheartened and surprised by the 9th Circuit Courts decision to vacate the labels for Enginia, Fexapan, and Xtendimax. We believe that EPA's decision to label these products was based on sounds scientific evidence and thoughtful engagement with the regulated community. Also, we believe that the current label requirements were sufficient to address environmental concerns and allow for their safe use. Many agricultural producers have dicamba tolerant crops planted and now need to make weed control applications. Timing is urgent. The court decision comes at a time that jeopardizes weed control abilities and leaves producers with product they cannot use and questionable ability to secure alternatives in a timely manner.

On behalf of the undersigned parties, we request that the Environmental Protection Agency (EPA) issue an "Existing Stocks Rule," or take other administrative actions as soon as is possible to allow the use of these products that farmers possess or are already in the supply chain for the 2020 growing season. Our producer members have already made a significant financial investment and are relying on this technology to get through this growing season. Additionally, our farmers are dealing with ongoing adversities related to unstable markets and impacts from COVID-19. The loss of the use of this product would create an even greater hardship on their business. Therefore, it is vital that this product remain available at least for the 2020 growing season.

Sincerely,

Alabama Farmers Federation
Georgia Farm Bureau Federation
Louisiana Farm Bureau Federation
Mississippi Department of Agriculture & Commerce
Mississippi Farm Bureau Federation
North Carolina Farm Bureau Federation
South Carolina Farm Bureau Federation
Texas Farm Bureau Federation