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From Austin Horn
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To the Honorable Alexandra Dunn
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I am a proud citizen of the United States of American and of the State of Iowa. I have worked professionally within the Agriculture Industry for 12 years and I am an 11 year employee of legacy Monsanto and currently Bayer Crop Sciences. Thank you for your time to read my comments below. The recent court ruling that vacated the registrations of low-volatility formulations of dicamba (XtendiMax, Engenia, FeXapan) is a major problem for many reasons. Some of these reasons are directly related to the production of Soybeans in the U.S. and many reasons are larger and more indirectly related. With that preface, I humbly but adamantly implore the EPA to acknowledge relevant context, use common sense and empower the American Farmer, the United States and its National Security pillar of Food Security by approving the re-registration of low-volatility dicamba in the utmost expeditious manner. Let me provide my detailed thoughts below.

Based on the market research statistics I have seen and know, there were 50 million acres of Xtend Soybeans in the U.S. in 2020. In addition, the vast majority of U.S. Cotton Acres are XtendFlex which provides tolerance to dicamba also. It is the #1 trait platform in the U.S. for both crops. Of those acres, a large majority received a pass of low-volatility dicamba to control otherwise impossible to control weeds. Literally overnight, this technology was made illegal. Thankfully, the EPA allowed growers to continue applications until July 31st, 2020. Thank You. However, looking forward, the industry (growers, chemical retailers and applicators, manufacturers of seed and chemicals) are completely and totally unsure of the future of this technology and have to assume there is real risk that it won't be legal next year. This is prompting these parties to make significant changes to ensure they can get the next best option, knowing they could get burned by changing too fast or not changing fast enough to secure limited alternatives. However, alternatives are limited. The industry cannot meet its needs when the #1 platform (in terms of acres and effectiveness) is outlawed overnight. Speed is of the essence and approval of re-registration is the only acceptable outcome.

One of the most frustrating things of all of this is that dicamba is a molecule that has been around for decades and decades. We know it is widely used in soybeans, but it is one of the most used molecules in corn and has been growing in popularity for several years. The dicamba formulations sprayed in Soybeans are low-volatility formulations. All other formulations used in corn or elsewhere are inherently higher in their volatility profile. When you think about how Corn and Soybeans are planted in the Midwest, it is most often in a 50/50 rotation. That means a soybean field is more commonly next to a corn field than a soybean field. This means that many of the issues that have been hyped and by default pinned on low-volatility formulations being sprayed on soybeans and then drifting are actually

the result of high-volatility formulations of dicamba in corn. If dicamba is a problem, it is not because of low-volatility formulations. If anything were to be mandated, why not mandate that formulations would not be legal unless they were low-volatility? Ironically, we have allowed the formulations prone to and known to have volatility issues to remain in place and have outlawed the formulations that have addressed this antiquated notion about what dicamba can be and is.

One of the issues stated to have been addressed by the court ruling was that dicamba tolerant beans led to monopolistic practices. That is completely false. Check the data for market share. Monsanto used to enjoy 96% market share with their Roundup Ready Trait at their height. Now, the soybean trait market is more fragmented than it ever has been and has more formidable competitors than ever. But, apparently, the judges and the plaintiffs believe the way to address too few market leaders is to outlaw one more, paving the way for total dominance by the competitors with Enlist technology. This is obviously politics at play by activists who have no interest in the farming community. Will toxic politics or farmers needs determine what is best for farmers?

If one believes in the freedom of choice, no matter if you are talking about soybean herbicides or anything in general, Americans have traditionally had the freedom to choose what is best for them. That is quickly eroding on many fronts as arrogant politically motivated activists believe they know what is best for all and have no obligation to debate and respect other opinions. This is a blatant example of government overreach. With all the challenges farmers face controlling weeds and successfully and profitably producing a crop, they need more tools, not fewer.

The industry is fearful that dicamba will not be available for use in-crop in 2021. We will see what happens. It is important to note that Enlist One herbicide was also taken to court in the 9th Circuit to challenge its label. Ironically, and luckily for its owners and our industry, it escaped the same fate of label vacation. We were one judge away from having both of the two major herbicide platforms used to produce soybeans in the U.S. from being outlawed. Had that happened, it would have effectively outlawed the production of soybeans based on the current best practices. This could have greatly, and still will to a large degree, threaten our ability to reliably and economically produce the safest and cheapest food supply in the world for the world's leading economic and military power. This is a National Security issue.

Let's not let farmers again be collateral damage for political games. It is tough enough fighting China with farmers being caught in the middle. We don't need domestic political activist forces using them as pawns either. Again, I, on behalf of many voices inside and outside the industry, implore the EPA to make this label re-registration THE top priority and to approve this re-registration as soon as the number one top priority can be accomplished.

Best Regards,

Austin Horn