To: The Honorable Alexandra Dunn

Assistant Administrator, Office of Chemical Safety and Pollution Prevention

Environmental Protection Agency

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From: Karl Nesse
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Subject: Do Not re-approve Xtendimax/Engenia/Fexapan/Tavium Herbicide Labels

As an independent crop consultant, I scout approximately 500 fields each week as well as the fields that I have an awareness of practices or provide partial services on in my community. Over the past few years we have seen the repeated problem of dicamba leaving soybean fields where these so-called low volatility dicamba formulations have been applied. In my estimation, nearly every time that I have seen these products used there is at least a small amount of off target movement. Whether it is affecting adjacent soybean fields or native plants/pollinator habitat during the time after soybean post application it is extremely easy to find plants or crops that are negatively affected by this product. Even when used according to the label this product is unable to be controlled much more often than is reported to the MNDept of Ag or EPA. As I scouted this summer I noted that 95% of my non-xtend traited soybeans displayed the characteristic dicamba damage symptoms with the few exceptions being extremely sheltered fields. While not 100% of this damage came out of dicamba resistant soybean spraying, a significant portion of it did. I make this statement as a subject matter expert and a trained agronomist.

As a result of this, our non-dicamba soybeans leaf canopy is greatly diminished and weed control has suffered as a result. Many of my farmer clients have expressed great reluctance to plant non-dicamba soybeans due to this fact. They make statements like: "I have to play defense from the neighbors spraying" "I don't want my beans all puckered up (puckering is the generic term for dicamba damage)" To me this is a great injustice that a product is more or less plant it or regret it because if you don't use it you will be damaged by it. This is also used as a sales pitch by the guys selling the RRXtend crop system seeds, while not an organized effort to my knowledge I have heard it used as a reason to plant them. "The neighbors are all Xtend, you better get on board".

In their current form, these products do not work as advertised and at a minimum need much further independent study. I hate having to advocate against weed control tools when we are pressed up against the wall with resistant weeds but it is not environmentally sound, socially sound, or good for anyone to have products that can physically pick up and leave the field hours after being sprayed (volatization).

This article by a well respected weed scientist and professor has some great points:[HYPERLINK "https://crops.extension.iastate.edu/blog/bob-hartzler-prashant-jha/dicamba-2020-what-went-wrong-iowa"]