Subject
Do Not Permit the Use of Dicamba & Conduct Research

Message
Dear Administrator Wheeler, I urge the Environmental Protection Agency not to permit the cancelled dicamba (3,6-dichloro-2-methoxybenzoic acid) herbicides for use in soybeans and cotton cropping systems for 2021 and beyond. Instead, the agency should undertake a full risk assessment on the impacts of the toxicity, volatility and dispersal tendencies of this chemical and short, medium and potential long term impacts to trees, pollinators and other wildlife, other non-target organisms and ecosystem composition before consideration of any new registrations of this herbicide. Highly volatile herbicides like dicamba are increasingly used in agriculture, with over 70 million acres planted to dicamba-resistant soybeans and cotton since 2016. Despite promises from manufacturers that the new in-crop dicamba formulations had solved long-known problems with dicamba volatility and off-target movement and damage, the recent rise in in-crop dicamba use has been accompanied by increased complaints about drift injury to specialty crops, trees, gardens and apiaries. Dicamba herbicides continue to vaporize and move long distances, harming plants a mile or more from where they are applied. Research indicates that trees, shrubs, and other flowering plants exposed to even very low levels of dicamba during sensitive developmental periods, such as leaf emergence, bud break, and flowering, experience reduced or delayed flower and nut production. Repeated exposure to damaging herbicides could result in trees and other flowering plants slowly dying, which then eliminates important sources of nectar, shelter and nesting places for insects and migrating birds when they need them the most. There is, however, limited-to-no research on impacts to wildlife and pollinators affected by dicamba-damaged vegetation and long-term ecological impacts of repeated exposure to this herbicide. With even larger areas of land being sprayed with such volatile herbicides, it is critical to pause to thoroughly study the damage to wildlife and their habitat and the balance of native ecosystems beyond crop fields. Thank you.

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