September 3, 2020

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US EPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
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Washington, DC 20460

Re: Comments regarding the renewal of dicamba for over-the-top use on herbicide tolerant soybeans and cotton.

Please accept the following comments on behalf of The Land Connection regarding the renewal of the registrations of the growth-regulating herbicide dicamba on herbicide tolerant soybeans and cotton. We are writing to request that EPA decline the renewal of registration of dicamba products.

These chemicals pose a serious threat to the health of farms, communities, and our greater natural environment. Since EPA conditionally registered these formulations for in-crop use in 2016, more than 5 million acres of crops have suffered off-target dicamba injury. That number only includes those acres where claims were reported, not including injury to private and public wildlands, or to the many row and specialty crop producers unable to recognize the cause of injury or unaware of their rights regarding off-target herbicide damage. This means that the full breadth of damage caused by dicamba application is certainly much greater than 5 million acres, and is vastly underreported. The reasons that dicamba should not be renewed are abundant.

1. Dicamba has proven to be a highly volatile chemical. It can drift easily, and when it lands on plants that have <u>not</u> been genetically modified to resist it, those plants suffer.

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2. All farmers, growers, and private landowners have the right to grow what they choose without fear of losing their crops to unintended chemical damage. This damage results not only in plant losses, but economic losses that can severely limit producers' ability to consistently earn a living income or put food on their tables.

3. Current injury reporting mechanisms and enforcement are ineffective. As noted earlier, injury from dicamba is greatly underreported. Current pesticide injury reporting mechanisms assume applicator error, not accounting for the extremely high volatilization and physical drift of dicamba that can lead to widespread damage even when an applicator is following the appropriate guidance. Current processes do not encourage or allow for private landowners to make claims of injury to their property further leading to an inability to assess the full scope of damage. And many producers do not report damage for fear of personal and financial impacts as well as a perception that nothing will come of their complaint. Growers and landowners alike are experiencing repeated dicamba exposures throughout the growing season and year after year. These exposures will result in lasting impacts to the health of trees and plants, native wildlife, sensitive crops, and water quality.

4. Continuing to allow the registration of coupled herbicide tolerant plants and herbicides is leading to increased herbicide tolerant weeds, thereby encouraging companies to continuously create more dangerous chemicals to combat increasingly hardy weeds, and keeping farmers beholden to these companies.

For the reasons outlined above, we request that EPA decline renewal of dicamba products. Removing these harmful products from our landscapes and communities is necessary to ensure that we are all able to live in a healthy, productive environment.

Sincerely,

Jacquelyn M Evers
Executive Director
The Land Connection

Cassidy Dellorto-Blackwell
Farmer Training Program Manager
The Land Connection

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