September 4, 2020

The Honorable Andrew Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Wheeler,

On behalf of the undersigned organizations, we ask the Environmental Protection Agency (EPA) to reach a timely and judicious decision on the new registrations for the Dicamba products Engenia, FeXapan, and Xtendimax. We ask that these registrations be simple, clear and understandable so our farmers will have clarity on the availability of these important crop protection tools as they began making their planting decisions for 2021.

The industries of agriculture and forestry together have a total economic impact of over $91 billion and provide more than 334,000 jobs in the Commonwealth, and are by far our largest industries. The Virginia Department of Agriculture and Consumer Services' (VDACS) 2019 Top 20 Virginia Commodities list indicates that soybeans and cotton alone are worth $289 million for Virginia farmers. However, weeds present real challenges to our farmers and can result in significant reductions in yield and value if left untreated. These Dicamba products are critical in allowing our farmers to realize positive yields and remain a viable part of our agricultural economy.

We understand that the June 3 decision by the 9th Circuit Court was unprecedented and presented serious challenges to farmers during the height of the growing season but also to your agency whose authority was challenged by this decision. We encourage EPA to remain steadfast in carrying out the duties it was tasked with by Congress through the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

The Commonwealth of Virginia takes great pride in our robust pesticide education and pesticide stewardship programs that are developed by VDACS and the Virginia Cooperative Extension Service. Virginia pesticide applicator certification training program has proven very effective in preventing incidents of drift resulting from Dicamba and other auxin herbicides. Our applicators also understand that effective weed control involves using a variety of modes of action to address and avoid resistance, including the OTT use of Dicamba products.

Farmers are beginning to make some of the most important decisions that they will make all year by selecting what seeds they plant and what crop protection tools they will use to treat their

crops. These choices result in significant investments and farmers need to have clarity before such decisions are made.

We understand the complexities of the registration decision EPA must make on the Dicamba products Engenia, FeXapan, and Xtendimax, but we ask that you reach this decision as expeditiously as possible so that our farmers can make the important decisions that they are also facing.

Sincerely,

Virginia Farm Bureau Federation
Virginia Agribusiness Council
Virginia Cotton Growers Association
Virginia Crop Production Association
Virginia Farm Credit Associations
Virginia Golf Course Superintendents Association
Virginia Grain Producers Association
Virginia Nursery and Landscape Association
Virginia Soybean Association
Northern Virginia Nursery and Landscape Association