Dicamba Over-the-top Use in Cotton and Soybeans Update
May 20-21, 2020 Pesticide Program Dialogue Committee Meeting

Background:

- The registrations for all dicamba products registered for over-the-top (OTT) use on cotton and soybeans genetically engineered to be dicamba-tolerant will expire on December 20, 2020, unless EPA acts to extend them.
- Dicamba OTT uses help growers protect cotton and soybean crops from Palmer amaranth, waterhemp, and other weeds that can be very difficult to control.
- Since USDA's deregulation of dicamba-tolerant cotton and soybean seed in 2016, the states and EPA have received many incident complaints citing crop injury from the off-field movement of dicamba.
- In October 2018, EPA extended the registration for OTT uses of dicamba in cotton and soybeans for two years. This decision required that dicamba labels for OTT use be updated with new use requirements intended to reduce the potential for off-site plant damage, including:
    - Requiring that applications only be made by certified applicators,
    - Prohibiting OTT applications of dicamba on soybeans 45 days after planting and cotton 60 days after planting,
    - Allowing OTT applications only from one hour after sunrise to two hours before sunset,
    - Adding an omnidirectional buffer zone in counties where endangered species concerns have been identified, and
    - Increasing the stringency of existing training requirements by requiring applicators to annually complete dicamba-specific training.
- Extensive data-sharing and dialogue with the pesticide manufacturers, farmers, state regulators, and other stakeholders informed EPA's 2018 decision to extend the approval of dicamba registrations with OTT uses.

EPA Regulatory Actions Planned for 2020 and Next Steps

- In anticipation of the December 20, 2020 deadline for considering registrations of dicamba products registered for OTT use, EPA is working to update its dicamba risk assessments in preparation for a new regulatory decision. EPA will reevaluate the dicamba OTT uses in the context of the Endangered Species Protection Act and the location-specific requirements that dicamba users must follow.
- EPA is reviewing newly available data submitted by registrants as part of the 2018 terms and conditions of registration for dicamba OTT uses, including expanded monitoring and incident data as well as field volatility studies regarding dicamba's potential for off-target movement. EPA is also reviewing newly available data submitted by academics and extension services.
- The Agency will continue to work with state lead agencies to better understand the adoption rate of dicamba technology and the resulting impact on individual states.

- EPA will continue to engage with various stakeholders in order to better understand dicamba's benefits for controlling weeds resistant to glyphosate and the potential for weed resistance to dicamba.
- The Agency intends to make a decision in a timeframe that informs grower planting decisions for 2021.