6 August 2020

The Honorable Andrew Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Mail Code: 1101A
Washington, DC 20460-0001

Dear Administrator Wheeler,

The Georgia Cotton Commission is a producer-funded organization representing roughly 3,500 family farmers that grow cotton in Georgia. Our efforts focus on programs facilitating the latest research, promotion, and education essential to support our farmers. We are writing to strongly encourage The U.S. Environmental Protection Agency to re-register Xtendimax with Vaporgrip Technology, Engenia, and FeXapan and allow our growers to use these weed management tools in 2021 and beyond.

Georgia growers and applicators have successfully used these herbicides for four years, improving weed control while actually reducing the number of pesticide drift complaints made to the University of Georgia Cooperative Extension Service. In regards to weed control, a survey of 1,737 growers representing over 2 million acres of agricultural production noted that Palmer amaranth and morningglory were the most problematic pests in all of Georgia agriculture. Dicamba systems control both of these weed species very effectively. In fact, an additional grower survey noted 57, 21, 11, and 5% of our growers observed >50%, 30-50%, 20-30%, and 10-20%, respectively, improved Palmer amaranth control with dicamba systems when compared to previously used systems.

As weed control has increased with dicamba technologies, the actual number of off-target pesticide drift complaints to the Cooperative Extension Service has reduced nearly 77% over the past five years. A cooperative training effort called *Using Pesticides Wisely* developed by the Georgia Department of Agriculture and the University of Georgia was implemented, generating sound science and communicating the results of that science to growers to help lower off-target movement of all pesticides. Over 6,800 individuals have been trained face-to-face in classrooms with over another 1,000 individuals being trained face-to-face on their farms. Georgia farmers embraced these trainings and more importantly embraced the scientific information shared with them helping improve on-target applications of all pesticides. Our state is a perfect example of what happens when all agricultural entities work together to improve pesticide stewardship!



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In addition to re-registering these dicamba formulations, we also ask this process be completed by the end of October 2020. Over the past few years, our industry has moved from farmers planting a handful of varieties to having roughly over 60 different variety options today. Thus, it is critically important that your decision on dicamba be made in a timely fashion allowing growers the ability to plan ahead for next year's crop.

Georgia is the second largest producer of cotton in the country averaging roughly 1.25 million acres of cotton; in 2019, one acre of cotton produced 953 pounds of cotton lint on average. Cotton is an extremely important crop to the engine that is American agriculture and agribusiness, and dicamba technologies are an important tool to the success of that engine. Our state has proven for four years in a row that XtendiMax, Engenia, and FeXapan can be used wisely in a manner that is safe for all parties – producers, consumers, and the environment.

Thank you for the opportunity to provide comments on this issue. We are available to discuss this topic with you directly at any time. The Georgia Cotton Commission implores you to continue to make dicamba technologies available to the American Farmer so that they can continue to feed the growing world.

Sincerely,

Bart Davis, Chairman

Cc: Secretary Sonny Perdue
Senator David Perdue
Senator Kelly Loeffler
Congressman Sanford Bishop
Congressman David Scott
Congressman Tom Graves
Congressman Austin Scott
Congressman Doug Collins
Congressman Rick Allen
Congressman Buddy Carter
Congressman Jody Hice
Congressman Barry Loudermilk
Congressman Drew Ferguson
Assistant Administrator Alexandra Dunn
Acting Director Edward Messina



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