August 7, 2020

Ms. Alex Dunn
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Mail code 7101M
Washington, D.C. 20460

Ms. Dunn:

On behalf of the undersigned organizations, I am writing to encourage the Environmental Protection Agency (EPA) to issue new registrations for the dicamba products Xtendimax®, Engenia, and FeXapan® as soon as possible. We request a multiple year registration that is simple, clear, and understandable. Our producers are in the process of making decisions for the 2021 crop year and need clarity before making purchasing decisions. Those decisions will be made in the very near future and a registration decision by August 31, 2020 is preferable.

We understand the challenges the agency is facing due to the recent decision of the 9th Circuit Court to vacate those registrations. We believe the court's decision was unfounded and that the current label restrictions are sufficient to properly use this technology, but we understand that the agency will need to address the issues raised by the court. In Mississippi, the additional training for dicamba application has been very successful and increased awareness for all pesticide applications.

Without the dicamba products, we are removing an additional crop protection tool that is critical to our weed resistance management programs. Multiple modes of action are necessary to prevent weed resistance from becoming a recurring and persistent issue. In addition, producers who are concerned about the ability to use dicamba are likely to shift technology for the upcoming growing season, potentially creating supply issues for their preferred seed.

Our producers have made significant investments in the dicamba tolerant trait crop. They rely on over-the-top use of the low-volatility formulations of dicamba to protect their crops from herbicide resistant weeds. We urge EPA to issue new registrations for the dicamba products as soon as possible.

Sincerely,

Mississippi Department of Agriculture & Commerce
Mississippi Boll Weevil Management Corporation
Mississippi Agricultural Consultants Association
Mississippi Farm Bureau ® Federation
Mississippi Agricultural Industry Council
Mississippi Corn Growers Association
Mississippi Seedsmen's Association
Mississippi Soybean Association
First South Farm Credit
Mississippi Land Bank
Southern Ag Credit
Delta Council
Staplcotn