



May 19, 2016

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Dicamba: New Use on Herbicide-Tolerant Cotton and Soybeans. Docket ID: EPA-HQ-OPP-2016-0187

To Whom It May Concern,

I submit these comments on behalf of the Oklahoma Farm Bureau (OKFB). OKFB is a general farm organization with more than 90,000 member families and is the voice of agriculture in Oklahoma. OKFB represents farmers with operations of all sizes who grow a wide variety of crops, including cotton and soybeans. We support enhancing farmers' ability to meet consumer and market demand. OKFB has always supported the use of sound science in state and federal regulatory proceedings.

OKFB supports the comments submitted by the American Farm Bureau Federation regarding the registration on dicamba formulations and has attached them here for reference. This registration will allow farmers to manage their crops and fields through a label that extends benefits and flexibility for weed management when used with already-deregulated dicamba-tolerant cotton and soybeans.

By approving this registration, EPA can help producers enhance their ability to manage weed resistance in a sound, scientific, and environmentally protective way, while helping growers produce strong yields and support our national economy. We expect that, upon registration, the dicamba formulations under consideration will provide U.S. farmers with a critical alternative to protect crops from hard-to-control and herbicide-resistant weeds. Growers in Canada and South America already have access to these tools. There is no reason U.S. farmers cannot be provided the same tools in growing their crops.

We want farmers to have access to weed-management products that meet the requirements of the law. We know they will utilize them consistent with label instructions approved by the agency. We are optimistic that the benefits provided by dicamba for deregulated dicamba-tolerant soybeans and cotton will provide producers an effective, economical, environmentally sound tool for their operations. We strongly recommend that EPA issue a final label for this new use for dicamba as soon as possible.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads 'Marla R. Peek'.

Marla Peek
Director of Regulatory Affairs

cc: OKFB Board of Directors

Attachment

May 20, 2016

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Docket No. EPA-HQ-OPP-2016-0187

Dear Sir or Madam:

American Farm Bureau Federation (AFBF) is the nation's largest general farm organization. Our members live and farm in all 50 states and Puerto Rico, and they are engaged in every segment of crop and livestock production. Our membership profile runs the gamut from small, organic producers to large grain farmers. We strongly support policies that enhance their ability to meet consumer and market demand, and our policies also support the use of sound science in Federal regulatory proceedings.

In this connection we are filing these comments in support of EPA's consideration of the registration of dicamba formulations that will enhance farmers' ability to manage their crops and their fields through a label that extends the benefits and flexibility for weed management when used with already-deregulated dicamba-tolerant soybeans and cotton. We hope that EPA will act promptly to issue a final label that provides growers these weed management tools as soon as possible.

Today, U.S. farmers face tremendous challenges, with commodity prices at their lowest point in years, rising input costs, and increasing global competition. The future outlook is similarly challenging. Looking at policy initiatives currently proposed by the Federal government, we anticipate higher regulatory costs in a number of areas. Moreover, while energy costs currently are low, that is unlikely to continue in the long term.

EPA has the ability to help producers enhance their ability to manage weed resistance in a sound, scientific, environmentally protective way while helping growers produce strong yields and support our national economy. We expect that, upon registration, the dicamba formulations under consideration will provide U.S. farmers with a critical alternative to protect crops from hard-to-control and herbicide-resistant weeds. Growers in Canada and South America already have access to these tools. There is no reason U.S. farmers cannot be provided the same tools in growing their crops.

AFBF would, however, like to recommend that the agency very carefully review its proposal to ensure that it optimizes farmers' ability to make use of this product. Specifically, we would urge

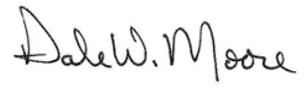
the agency not to limit farmers' utilization of these formulations by imposing tank mix restrictions; such a provision would have several impacts. It would, in all likelihood, limit the ability of farmers to take full advantage of the multiple modes of action of dicamba and glyphosate in a way that is both cost-effective and efficient for producers. It might compromise the sustainability of farmer operations by additional applications beyond what is necessary. In mandating multiple passes over a field, there would be a resulting impact for farmers—increased fuel consumption, higher application costs, greater wear on equipment and undoubtedly increased soil compaction. With the unpredictable weather of spring planting, the window for effective application is already limited. Adding a second application only compounds this problem, and we strongly encourage the agency not to adopt this provision.

It is AFBF's understanding that concerns the agency might have related to herbicide use near sensitive crops are being addressed by the product petitioner through technology and stewardship measures. We urge the agency to work with the petitioner in a constructive fashion to resolve this issue. In the experience of our grower members, good neighborly practices often facilitate coexistence. Off-site movement of dicamba, like that of other herbicides, can be minimized through proper stewardship including application techniques, equipment settings, nozzle selection and consideration of environmental conditions such as wind speed during application.

These new dicamba formulations appear to be an improvement over first-generation dicamba products. This is a significant factor which we believe should inform any judgment EPA might make related to buffer requirements. We urge the agency to consider the impact these advanced formulations will have and recognize the impact buffer restrictions would have for a grower in being able to manage weed resistance on his or her property. Specifically, the around-the-field buffer incorporated in the draft label may well impede effective and economical weed control within the buffer and we are concerned that such an approach would compromise the effectiveness of this tool for growers. Should the agency proceed in this manner, farmers would be confronted with the decision of how to manage weeds in areas of the field where dicamba may not be used; it is unclear how farmers will address such a problem but it might well raise questions of using conventional tillage or hand weeding in the buffer area to fight hard-to-control weeds. Resistance that develops in this buffer area could limit the overall value of weed resistance management and conservation tillage.

AFBF appreciates this opportunity to comment on this proceeding, and we believe that the regulatory process should proceed in a timely and expeditious fashion. We want farmers to have access to weed-management products that meet the requirements of the law, and we expect that they will utilize them consistent with label instructions approved by the agency. We are optimistic that the benefits provided by dicamba for deregulated dicamba-tolerant soybeans and cotton will provide producers an effective, economical, environmentally sound tool for their operations. We strongly recommend that EPA issue a label for these new dicamba formulations that supports the full benefits of those technologies.

Sincerely,

A handwritten signature in black ink that reads "Dale W. Moore". The signature is written in a cursive style with a large, prominent 'D' and 'M'.

Dale Moore

Executive Director Public Policy