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May 25, 2016

Susan Lewis
Dicamba: New Use on Herbicide-Tolerant Cotton and Soybeans
Environmental Protection Agency
Mailcode 28221 T
1200 Pennsylvania Ave, NW
Washington, DC 20460

**Re: Dicamba: New Use on Herbicide-Tolerant Cotton and Soybean
Docket ID: EPA-HQ-OPP-2016-0187**

Dear Ms. Lewis:

On behalf of the American Soybean Association (ASA), I am writing about the dicamba new use petition for soybeans and cotton. ASA represents all U.S. soybean farmers on domestic and international issues of importance to the soybean industry. ASA's advocacy efforts are made possible through the voluntary membership in ASA by over 22,500 farmers in 31 states where soybeans are grown.

First, let me stress how anxious soybean farmers are to bring new products to market. Resistance is to be expected for any crop protection product, and the weed resistance issues farmers are facing are grave. We fully understand the need for multiple modes of action and are eager to adopt new technologies across our farming operations. The demand to use dicamba in combination with dicamba-tolerant soybeans is urgent. We urge the Agency to make this new weed control tool available on the quickest possible timeline.

We recognize the contributions of EPA, industry, and individual farmers in managing weed resistance. Take Action is a unique collaborative initiative involving grower groups and industry which was developed to assist farmers in making herbicide applications and managing weed resistance. ASA is proud to be a partner in Take Action.

We do want to raise two issues of concern about the proposed dicamba label that we believe must be corrected in any final label. These are:

1. Restrictions on tank mixing of dicamba with other herbicides
2. Required 110 foot buffer around field perimeters

The proposed label states: "TANK MIXING INSTRUCTIONS: RESTRICTIONS: DO NOT TANK MIX ANY OTHER HERBICIDE WITH M1691 HERBICIDE."

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Tank mixing herbicides with different modes of action is a common practice. The proposed restriction is impractical, is counter to good herbicide resistance management practices, and is counter to environmental stewardship. Farmers have experience in successfully tank mixing herbicides with different modes of action as part of good weed resistance management. Farmers cannot be expected make multiple field applications of single herbicides for numerous reasons, including:

1. Due to the fast growth of weeds and often limited “window” for spraying fields due to weather conditions, multiple applications of single herbicides to the same field to control weeds at the recommended growth stage would be impractical if not impossible.
2. Making multiple trips across the same field would greatly increase fuel use, costs to growers, and greenhouse gas emissions.
3. Making multiple trips across the same field would increase soil compaction and reverse grower efforts to improve soil structure.
4. Farmers have experience in judiciously tank mixing herbicides and rely on professional expertise from cooperatives, universities, and their crop consultants.

For these reasons, we urge EPA to remove the prohibition on tank mixes.

A second serious concern involved the required 110 foot buffer around field perimeters. Again, such a buffer is impractical in farming operations. We urge the Agency to adopt a more practical buffer such as a downwind buffer only. Farmers are well-versed in measuring wind speed before spraying, and in using an abundance of caution. Spray drift that impacts a farmer’s unintended crop is bad; spray drift that impacts a protected area or his/her neighbor’s property is even worse. That’s why farmers take caution to avoid off-target movement. A 110 foot buffer as currently proposed will take many fields out of consideration for dicamba use altogether.

On this issue we also note our awareness that major manufacturers of dicamba formulations plan to commercialize formulations with even lower volatility than those available today. With these ultra-low volatility formulations, a 110 foot buffer around field perimeters is even more unnecessary and impractical.

For these reasons, we urge the Agency to remove the field perimeter buffer requirement and instead adopt an appropriate downwind buffer only.

On behalf of ASA, let me reiterate how anxious farmers are for new weed management strategies like dicamba. We encourage EPA to approve it expeditiously.

Thank you for considering our views.

Sincerely yours,



Richard Wilkins
President