



June 3, 2024

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Docket ID Number: EPA-HQ-OPP-2024-0154-0001

RE: Pesticide Product Registration: Application for New Use - Dicamba

Dear Administrator Regan:

The Florida Farm Bureau Federation (FFBF) welcomes the opportunity to submit comments urging the United States Environmental Protection Agency (EPA) to approve the new application for use of dicamba for dicamba-tolerant cotton and dicamba-tolerant soybeans (EPA-HQ-OPP-2024-0154-0001).

FFBF is a grassroots organization representing 132,000 member-families, many of whom are cotton and soybean producers.

In February 2023, a federal judge in Arizona vacated the label for over-the-top (OTT) use of dicamba for cotton and soybeans on procedural grounds. At the urgent request of many voices within agriculture, including FFBF, EPA granted an existing stocks order, which permitted farmers and ranchers to apply this use for the current growing season. However, uncertainty remains regarding whether there will be permitted uses of this product for cotton and soybeans for the 2025 growing season. To address this, Bayer CropScience submitted an amended label for EPA review.

FFBF urges the EPA to recognize the critical need for the amended Bayer CropScience label. Due to Florida's sub-tropical climate, pre-emergent and post-emergent options to control pest pressures at each stage of crop production are imperative to successful yield. Florida's climate is ideal for weed pests during its long growing seasons, which can further exacerbate challenges with mitigations. As such, without effective integrated risk management tools, Florida's farmers and ranchers will be forced to accept reduced yields and quality, further intensifying the challenges of already risk-laden production.

Since 1967, dicamba has been an effective systemic herbicide for a variety of agricultural crops with consistent EPA review and backing. In accordance with



science-backed label instructions approved by the EPA, dicamba is a proven and safe product to control weed pressure.

FFBF recognizes the ongoing challenges the EPA is facing regarding the Endangered Species Act (ESA) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and supports the Agency in meeting these statutory requirements. Furthermore, FFBF is committed to working with the Agency to find a path forward that will maintain accessibility of registered use products, decrease off-target movement, and provide producers with the necessary toolkit to protect their crops.

FFBF's annually member-ratified policies support the need for dicamba in the toolbox of Florida's row crop growers. Florida Farm Bureau members support actions that ensure new crop protection products are available and urge that the banning or limiting of such products be based on sound science.

Thank you for your consideration.

Sincerely,

Jeb S. Smith
President
Florida Farm Bureau Federation

cc:

Rod Snyder, Senior Advisor for Agriculture
Ed Messina, Director, Office of Pesticide Programs