



AGRIBUSINESS
ASSOCIATION OF IOWA

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October 17, 2022

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Dicamba registration review, ID EPA-HQ-OPP-2016-0223-0026

To Whom It May Concern:

The Agribusiness Association of Iowa (AAI) exists for the purpose of advocating, communicating, and educating on behalf of a proactive, profitable, and environmentally responsible professional agribusiness industry. AAI's membership consists of approximately 200 businesses with over 1,100 locations across the state that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture.

Many of our members' locations employ certified pesticide applicators who apply pesticides to their customers' fields. We appreciate the opportunity to submit comments regarding the dicamba registration review because dicamba is an important herbicide for effective weed control.

Dicamba has been in use since the 1960's. Since then, it has a proven record for safe, economical, and effective weed control. EPA should continue to maintain the registration of dicamba products based on peer-reviewed science and data that continue to show it is safe when applied according to the label.

EPA strongly encouraged Iowa's development of the [Iowa Pest Resistance Management Program](#) to protect Iowa crops from costly pest resistance. AAI plays an active role in this program, and we need multiple modes of action and timing of applications available to applicators to battle the costly development of pest resistance. Dicamba is an important tool for managing resistance that has developed in some weeds to multiple herbicide modes of action. It is important for applicators to continue to have both pre- and post-emergence dicamba application options as part of their available toolkit to successfully control weeds and pesticide resistance.

If applicators have fewer herbicide options to control weeds, the use of tillage for weed control will increase. In Iowa, EPA has strongly encouraged our state's development and implementation of the [Iowa Nutrient Reduction Strategy](#) to reduce nutrient loss to Iowa waters and the Gulf of Mexico. We have made great progress as a state to reduce tillage and decrease phosphorus losses compared to our 1980-1996 baseline. If dicamba is less practical, economical, or effective to use, tillage for weed control will increase, leading to increases in soil erosion, phosphorus losses, and greenhouse gas emissions while decreasing soil health and water quality.

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Thank you for the opportunity to provide comments regarding the dicamba registration review and the need for access to dicamba as an important weed control tool for our members and their customers.

Sincerely,

A handwritten signature in black ink that reads "Bill Northey".

Bill Northey
Chief Executive Officer
Agribusiness Association of Iowa