

May 24, 2016

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

Regarding the Proposed Decision to Register the Herbicide Dicamba for Use on Cotton and Soybean

DOCKET ID: **EPA-HQ-OPP-2016-0187**

The Georgia Cotton Commission (GCC) is a producer funded organization representing the cotton producers of Georgia. Georgia is the second largest cotton growing state with a \$960 million farm gate value and a total economic contribution of \$2.6 billion to the economy of Georgia. The Georgia cotton industry also accounts for over 20,000 jobs in our state. Agriculture is the largest industry in Georgia accounting for over 411,000 jobs and has a total economic impact of over \$74 billion to Georgia's economy.

GCC supports the decision to register dicamba for use on cotton and soybean crops. With the advent of herbicide-resistant weeds, primarily glyphosate-resistant palmer amaranth, Georgia cotton farmers have collectively spent over \$1 billion in a decade on weed management costs. Our growers are desperately seeking new options to control palmer amaranth and many have resorted to hand labor for weeding fields, an extremely costly and time consuming method. We believe that the new dicamba herbicide systems for cotton and soybeans will greatly reduce the burden of controlling glyphosate-resistant palmer amaranth.

GCC has been actively engaged in learning about the new dicamba systems from both the private and public sector. Our board members and staff have attended numerous field days and trainings from both Monsanto and the University of Georgia where this new technology has been discussed in detail. Our board members and staff have

provided valuable input to the knowledge transfer process of this new technology to our cotton farmers here in Georgia.

Although we support the labeling of dicamba for use on cotton and soybeans, several proposed label restrictions set forth in the proposed registration are not feasible proposals for Georgia cotton farmers. First, the proposed buffer of 100 – 220 feet would completely eliminate many growers from utilizing this technology. We understand the concerns with off-target drift and volatility but a more feasible solution must be sought. At the higher rate, with the required 220' buffer, a 10 acre cotton field could only have dicamba applied to 4.4 acres in the center of the field. That would be an unpractical approach to applying a crop protection product. These excessively large buffers also do not account for situations in which there are non-sensitive crops adjacent to the dicamba application site nor do these proposed buffers account for wind direction during application. A blanket buffer from all field edges, as proposed in the rule, creates an unnecessary in-field crop buffer to buffer against an adjacent crop that is not sensitive to dicamba nor is downwind of the dicamba application.

Second, the proposal does not allow tank mixing of dicamba with other products. This is also troublesome for Georgia cotton farmers. Tank mixing is a well-established practice in Georgia allowing our growers to efficiently utilize their time and effort for applying crop protection products. Tank mixing also allows growers to utilize multiple modes of action to combat weeds in a single trip across the field. Not allowing tank mixing of dicamba with other products will force growers to spend more time and money for an unnecessary extra trip across a field.

Third, the proposed restriction of only one type of nozzle for dicamba application is not a feasible proposal. Several companies manufacture low-drift nozzles that could be used in the application of dicamba; restricting the label to include only one of these nozzles creates an unnecessary burden for cotton farmers.

In conclusion, GCC supports the registration of dicamba for use on cotton and soybeans. This valuable tool will provide our growers with a new method of combatting palmer amaranth and will be a useful tool in the long-term viability of the cotton industry in Georgia. We opposed the proposal to create excessively large buffers, we do not support the prohibition of tank mixing dicamba with other crop protection products, and we opposed the restriction of only one legal application nozzle.

Sincerely,

A handwritten signature in black ink that reads "Mike Lucas". The signature is written in a cursive, flowing style.

Mike Lucas

Chairman

Georgia Cotton Commission