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February 8, 2024

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

The National Cotton Council, the central organization of the U.S. cotton industry, is extremely concerned that the vacatur of all over-the-top dicamba herbicide labels leaves millions of cotton acres with less effective and more costly weed control options for the 2024 growing season. We are also concerned that the loss of dicamba will lead to increased cultivation that will promote more erosion and greenhouse gas emissions.

The dicamba tolerant weed control system was used on approximately 78% of the 11.1 million cotton acres planted in 2023. Planting for the 2024 cotton growing season has begun in south Texas and our growers indicate that their 2024 seed and herbicide decisions are similar to 2023.

With no time to manufacture and deliver alternative planting seeds and herbicides, the loss of these foundational dicamba herbicides places millions of cotton acres at risk of lost production. Production losses from poor weed control would exacerbate an already dire economic situation for cotton farmers as total production costs are higher than current cotton prices, absent above-average yields.

For the reasons of time, scope, and economics, the National Cotton Council respectfully requests the EPA to allow farmers to use existing stocks of XtendiMax, Enginia, and Tavium currently in the supply chain, including distributors and retail outlets. A flexible and inclusive existing-stocks decision is critical to the economic viability of our family farming operations.

Respectfully,

A handwritten signature in cursive script that reads "Gary M. Adams".

Gary M. Adams
President and CEO

cc:

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