



PLAINS COTTON GROWERS INC.

Legislation. Research. Promotion. Service.

February 8, 2024

The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, DC 20460

Dear Administrator Regan,

On behalf of the membership of Plains Cotton Growers, Inc. (PCG), I am writing to express our concern over the ruling by the Arizona Federal court to vacate the dicamba label for over-the-top (OTT) application. To minimize the adverse impact of this ruling, we respectfully request the EPA draft and grant an existing stocks order that provides producers the opportunity to access and apply the OTT dicamba-based products currently in the retail supply chain.

PCG is the certified producer organization representing cotton growers on the Texas High Plains and, like other areas of the cotton belt, our members plant 75% or more of the region's acres with seed that contains the dicamba-tolerance trait. Losing access to the dicamba products impacted by the court's ruling will create a significant and damaging economic impact on growers who rely on them to control a wide array of herbicide-tolerant weeds.

The Court's decision to vacate the dicamba label for OTT application could not have been issued at a more inopportune time for the farmers who depend on the impacted products and use them as part of a comprehensive weed management program in their crops. Producers have already made significant and costly cropping decisions regarding the 2024 crop. In some cotton producing areas of Texas, planting is nearly underway, while others have begun work preparing fields, securing seed and purchasing the crop protection products they planned to utilize this growing season — including dicamba products intended for OTT applications. Limited access to existing stocks of the OTT dicamba products will create supply issues as growers are forced to scramble to secure potentially limited alternative products and exacerbate an already difficult economic situation for growers facing inflated input costs and 2024 commodity prices that are below their cost of production.

PCG encourages EPA to carefully weigh the adverse impact a limited existing stocks order will have on producers. Again, we ask the agency to craft an order allowing access to those products already in the retail supply chain, which will provide growers the flexibility to utilize those stocks on their 2024 crops.

Respectfully,

Kody Bessent
Chief Executive Officer