



October 17, 2022

Environmental Protection Agency
Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Pesticide Registration Review: Dicamba Revised Human Health and Draft Ecological Risk Assessments; Docket # EPA-HQ-OPP-2016-0223

The Agricultural Retailers Association (ARA) appreciates the opportunity to comment on EPA's registration review revised human health and draft ecological risk assessments for dicamba.

ARA is a 501(c)(6) non-profit trade association that represents the interests of agricultural retailers and distributors across the United States on legislative and regulatory issues. Ag retailers supply farmers and ranchers with products and services such as seed, nutrients, crop protection products, feed, equipment, and technology. Retailers also provide consultative services such as crop scouting, soil testing, field mapping, custom planting and application and development of nutrient management and conservation plans. Agricultural retailers range in size from small, family-held businesses to large companies and farmer-owned cooperatives with multiple outlet stores. Large and small retail facilities are scattered throughout all fifty states and provide critical goods and services, as well as jobs and economic opportunities in rural and suburban communities.

Weed resistance continues to be a growing issue that impacts several crops produced in the United States. Several different dicamba formulations have been safely and effectively used by the nation's agricultural industry since 1963. Dicamba is an important tool for managing resistance to multiple herbicide modes of action. It is important for farmers to continue to have options as part of their available toolkit to successfully combatting weeds.

It is in the best interest of America's agricultural production for EPA to continue to maintain the registration of dicamba products consistent with peer-reviewed science and data. Thank you for your review and consideration of our comments.

Sincerely,

Richard D. Gupton
Senior Vice President, Public Policy and Counsel