

June 5, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Administrator Wheeler:

The Ninth Circuit Court of Appeals' decision on dicamba announced June 3, 2020 is devastating to our nation's farmers and an affront to the regulatory system for pesticides established under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). We are writing to ask you to take immediate action to provide farmers, distributors, and pesticide manufacturers clarity and certainty in how they can protect their crops during the heart of the growing season.

The FIFRA statute provides due process for pesticide manufacturers and users when a registration is cancelled by the agency. Similarly, the EPA has previously provided existing stocks exemptions for products in the channel of trade once a registration withdrawal is announced. These precedents should be followed in this instance to ensure continuity for farmers and minimal disruption of the supply chain.

We would like to discuss this issue with you at your first opportunity to share the consequences this decision will have on farmers, distributors, and manufacturers. We are hopeful the EPA does understand the urgent and immediate need to respond to this egregious decision.

Thank you for your consideration. We look forward to visiting with you soon.

Sincerely,

CropLife America
Agricultural Retailers Association
American Seed Trade Association
Council of Producers & Distributors of Agrotechnology
National Association of Wheat Growers
National Cotton Council
National Farmers Union
National Sorghum Producers
USA Rice Federation