

Elizabeth Vizard  
Immediate Office  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

**RE: Innovation Challenge: Alternatives to Conventional Pesticides for Crop Desiccation  
(EPA-HQ-OPP-2026-3862)**

Dear Deputy Director Vizard:

The National Association of Wheat Growers (NAWG) appreciates the opportunity to respond to the Request for Information on developing an Innovation Challenge focused on non-conventional alternatives to crop desiccation. NAWG represents farm families from across the United States who grow one of the nation's most important food crops using diverse farming practices and facing different environmental conditions.

Wheat growers share EPA's interest in advancing innovative technologies that improve agricultural productivity while continuing to protect human health and the environment. Research into new harvest management tools could expand producer options, improve efficiency, and support sustainable farming systems. As EPA develops this initiative, however, it must recognize the diversity of U.S. cropping systems and design a program that reflects how these crops are actually grown.

For wheat growers, using a chemical desiccant to dry down the crop is a highly uncommon practice. In most regions of the United States, wheat reaches maturity and dries naturally in the field before harvest. Environmental conditions, climate, and varietal selection typically allow wheat to reach harvest moisture without desiccants. When pesticides are applied after the wheat crop has been planted, they are generally used for pre-harvest weed control rather than to accelerate crop dry-down. Pre-harvest weed control prevents weeds from causing harvest difficulties, damage to expensive machinery, and reduces the risk of grain quality loss. Such applications are limited and occur only under EPA-approved label directions. This distinction is important because alternative products appropriate for one crop or production system may not be relevant or effective in another. Although pre-harvest weed control applications are rare, the EPA should recognize the role pesticides play in growing wheat.

Wheat growers rely on a wide range of crop protection tools to manage weeds, fungi, insects, diseases, and respond to changing field and weather conditions throughout the growing season. As the EPA considers the innovation challenge and funds research into alternatives, the Agency should ensure that any alternatives complement current farming practices rather than limit growers' access to safe and effective pesticide tools. The innovation challenge should also

be flexible enough to encourage innovation across a broad range of crops and production practices rather than focusing on a single region or crop.

Growers already employ numerous non-chemical management practices that reduce the need for desiccants wherever practical. Varietal selection, harvest timing, and allowing crops to dry naturally in the field are all common factors considered when growing wheat. In certain regions and production systems, practices such as swathing or windrowing may also be used to promote uniform crop maturity before harvest. These practices show that farmers routinely adopt management approaches tailored to local conditions and are willing to implement non-chemical alternatives when practical, effective, and economically viable.

Despite these existing practices, significant barriers remain to broader adoption of non-conventional alternatives. Agricultural technologies must perform reliably across a wide range of environmental conditions, cropping systems, and geographic regions. An approach that works in one crop or region may not work in another. Many alternative practices also require additional labor, specialized equipment, or changes to harvest timing, increasing both operational complexity and the cost of growing wheat. For wheat growers operating in today's difficult farm economy, the cost of any practice matters. Farmers continue to face high input costs, tight operating margins, and volatile commodity prices, making investments in new technologies challenging unless they clearly improve efficiency or significantly reduce costs of planting and harvesting wheat.

For wheat growers, advances in breeding represent an important innovation that could reduce chemical use in wheat farming. Public and private breeding programs have spent decades developing varieties that combine high yield with disease resistance, drought and weather resilience, grain quality, and other traits important to farmers and end users. Breeders are also working to incorporate resistance to pre-harvest sprouting and uniform maturity. NAWG encourages EPA to specifically consider ongoing research into wheat genetics and pre-harvest sprouting resistance when identifying existing technologies and research that could inform the challenge. EPA should consider partnerships with public and private wheat breeding programs as well as land-grant universities when identifying potential participants or award winners. These programs provide established research infrastructure and a pathway to turn genetic discoveries or improvements into commercially available varieties.

For non-conventional alternatives to achieve widespread adoption, they must provide growers with practical and cost-effective options that offer meaningful benefits beyond existing management tools. Successful technologies should maintain harvest efficiency, preserve grain quality and yield, integrate with existing farm equipment and management systems, and perform consistently under commercial farming conditions. Because growers already have access to safe and effective tools reviewed and registered by the Agency, future alternatives should provide clear agronomic and economic benefit to justify adoption. Alternatives that substantially increase labor requirements, delay harvest, or reduce profitability are unlikely to be adopted regardless of their merit. Consequently, EPA should evaluate potential alternatives not only for scientific innovation but also for economic feasibility and practicality for farmers.

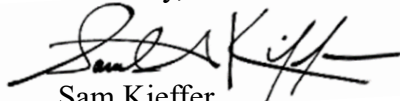
NAWG supports EPA's efforts to encourage innovation through collaborative research and believes the proposed Innovation Challenge should prioritize the development of practical technologies that can be successfully implemented on American farms. Research funding should encourage collaboration among universities, private industry, growers, extension specialists, and equipment manufacturers to ensure new technologies are developed with direct input from agricultural stakeholders.

Because agricultural innovation is inherently uncertain and often requires multiple years of research and in-field validation, EPA should establish a phased program that includes clearly defined milestones and periodic progress reports. Requiring recipients to demonstrate measurable progress throughout the project would provide accountability while allowing EPA to monitor whether funded research continues to show commercial promise. Commercial-scale demonstrations conducted under real-world farming conditions should also be encouraged to ensure potential technologies are evaluated in the environments where they will ultimately be implemented.

The Innovation Challenge should avoid favoring any single type of solution. Chemical desiccants, while used very infrequently in wheat, are used across numerous crops, agricultural systems, and geographic regions. Successful alternatives should likewise have the potential for broad applicability where appropriate. Rather than focusing on a particular technology or farming practice, EPA should encourage innovative solutions capable of addressing multiple agricultural systems while allowing researchers flexibility in how they achieve that objective. Evaluation criteria should consider technical performance, environmental benefits, economic feasibility, scalability, and the likelihood that a technology can ultimately be adopted by farmers.

NAWG appreciates EPA's consideration of stakeholder perspectives as it develops the Innovation Challenge and encourages the Agency to take a practical, farmer-focused approach. Continued investment in breeding, agronomic research, technology, and other innovative approaches can expand the tools available to wheat growers while maintaining the productivity, quality, and profitability of U.S. wheat. NAWG looks forward to continued engagement with EPA as the Agency develops this initiative and encourages EPA to ensure that any resulting programs recognize the diversity of U.S. agriculture and the economic realities facing farmers.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Kieffer", with a stylized flourish at the end.

Sam Kieffer  
CEO