



September 12th, 2018

The Honorable Andrew Wheeler
EPA Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Acting Administrator Wheeler,

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, conservation, and fostering the economic vitality of our rural communities. Combating the spread of disease and environmental protection are also among our chief responsibilities.

In addition, NASDA members work closely with the EPA to regulate more than 900 active ingredients used in as many as 40,000 formulated products used nationwide that are registered under FIFRA. NASDA members appreciate that a principal objective of FIFRA is to protect human health and the environment from unreasonable adverse effects of pesticides by taking into account the costs and benefits of various product uses.

NASDA believes that providing a wide range of crop protection options to American farmers and ranchers is essential to their economic viability. NASDA also recognizes that managing weed resistance has become a major challenge for many agricultural producers. Resistance is growing in terms of the number of weeds exhibiting resistance and the number of herbicides to which weeds are becoming resistant. New technologies, such as Dicamba, can address some of the weed control needs that most farmers and ranchers are facing across the country.

As EPA reviews the registration of multiple Dicamba products, NASDA respectfully reminds EPA of the important role that NASDA members have as co-regulators of FIFRA approved products, and the role that they played on improving Dicamba stewardship through training, application timing and open community communications. In addition, NASDA would like to highlight that as EPA is reviewing Dicamba registration, state flexibility is increasingly important.

We appreciate the opportunity to express our views on how to help meet some of the current challenges facing agricultural producers. Individually, regionally and collectively, NASDA members have

knowledge and expertise that may offer an additional or perhaps unique perspective on this topic, so if at any time we can be of assistance, please don't hesitate to contact NASDA staff.

Sincerely,

A handwritten signature in black ink that reads "Barbara P. Glenn". The signature is written in a cursive, flowing style.

Barbara P. Glenn, Ph.D.
Chief Executive Officer