



*U.S. Canola Association
600 Pennsylvania Ave., SE, Suite 300
Washington, DC 20003
Phone (202) 969-8113*

June 7, 2024

Office of Pesticide Programs
Regulatory Public Docket
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

RE: Docket No. EPA-HQ-OPP-2020-0250

Dear Sir or Madam:

The U.S. Canola Association (USCA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed registration of glufosinate-p-ammonium, the new active ingredient contained in Liberty® ULTRA Herbicide, powered by Glu-L Technology from BASF.

The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil and protein. Since USCA's establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to approximately 2.4 million acres in 2023.

The USCA strongly supports the registration of Liberty ULTRA. Liberty ULTRA represents an advance in herbicide technology that will benefit growers and other agricultural industry stakeholders. Liberty ULTRA provides foundational, broad spectrum weed control that can be used across millions of acres of glufosinate-tolerant canola, corn, cotton, and soybeans.

The use of herbicides is vitally important to the viability of farming operations and carry many benefits. Weeds compete with crops for limited resources, such as nutrients, moisture, and sunlight. If not properly managed, weeds can result in significant crop yield reductions which has an economic impact on farmers, consumers, and the environment. Our ability to maximize crop yields has a beneficial impact on the emissions associated with food and energy production. Weeds also impact water usage and exacerbate moisture issues for growers and crops in drier climates.

Liberty ULTRA Herbicide (containing the new active ingredient glufosinate-p-ammonium) would represent the first registration of the resolved isomer of glufosinate for use in the United States. It is our understanding that Liberty ULTRA will be registered in the same crops and crop use patterns as Liberty® 280. The Glu-L Technology utilized in Liberty ULTRA typically

reduces the application use rate by 25% compared to the current racemic mixture of glufosinate marketed as Liberty® 280. The lower use rate provides several important economic and environmental benefits including less inactive material introduced to the environment while still maintaining a high level of efficacy on difficult weeds, like waterhemp and palmer amaranth. We understand from the registrant that the carbon footprint associated with the transportation of Liberty ULTRA will also be reduced by 46% compared to racemic mixture versions of glufosinate. The Liberty ULTRA product also incorporates mitigation measures required by the EPA to protect endangered species.

Thank you again for the opportunity to comment on the proposed registration. Canola growers in the U.S. depend on access to new crop protection innovations to successfully manage their operations. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Tim Mickelson".

Tim Mickelson
President