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August 21, 2024

Charles Smith
Director, Registration Division (7505T)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Submitted via regulations.gov

Re: *Pesticide Product Registration: Application for New Use* (Docket ID No. EPA-HQ-OPP-2024-0154)

Dear Mr. Smith:

The US Canola Association (USCA) writes to submit comments regarding EPA's notice of receipt of Syngenta's application proposing to register new uses of dicamba on dicamba-tolerant soybeans and dicamba-tolerant cotton. The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. Since USCA's establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to over 2.6 million acres in 2024.

The USCA supports the registration of the dicamba product referenced in these comments as well as two other low volatility dicamba products awaiting registration.

Canola growers rely heavily on essential herbicide tools to manage weed issues in their crops. The development of herbicide tolerance has revolutionized agricultural sustainability by enabling farmers to boost yields and minimize soil disturbance. Herbicide-tolerant (HT) crops are vital in supporting conservation tillage practices, which help reduce fossil fuel consumption, protect topsoil, maintain soil health, and minimize run-off and erosion.

The canola industry has greatly benefited from HT technologies, particularly through the widespread adoption of glufosinate and glyphosate-tolerant canola hybrids. Additionally, the use of HT crops in rotation with canola, such as corn and soybeans, has further supported these benefits. Glufosinate-tolerant hybrids currently hold the largest market share within the canola industry, making glufosinate a crucial component of canola production.

However, the extensive use of HT crops and associated herbicides has led to the emergence of glyphosate-resistant weed species in key canola-growing regions. North Dakota State University (NDSU) has documented glyphosate-resistant kochia populations in the area, and dicamba has proven effective in managing these populations in dicamba-tolerant soybean crops. Resistant weeds have now become a significant challenge for canola growers, both in canola and rotational crops. Should resistance to glufosinate emerge, canola growers may be forced to revert to older, less effective technologies.

Reports of glufosinate-resistant Palmer amaranth in several states have raised concerns, particularly as glufosinate use has increased due to its compatibility with Enlist soybean weed management programs. It is crucial for growers to utilize multiple modes of action across all crops to combat weed resistance effectively.

To maintain effective weed control options in canola, it is vital for growers to continue using dicamba in soybeans planted in rotation with canola. The use of dicamba in soybean fields plays a key role in whole-farm weed management for canola and other crops. If dicamba is no longer available to soybean growers, it will significantly increase the pressure for glyphosate and glufosinate resistance, jeopardizing canola production and the ability to provide a healthy source of oil and meal.

We urge the EPA to register this and other new uses of low volatility dicamba products as soon as possible. This will allow growers and the supply chain to plan proper crop rotations for the upcoming growing season. We appreciate your consideration of our request and look forward to working with the EPA on this matter.

Respectfully yours,

A handwritten signature in black ink that reads "Tim Mickelson". The signature is written in a cursive, flowing style.

Tim Mickelson
President