



## *“Creating Solutions Together”*

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May 29, 2024

Office Of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460-0001

Re: Docket ID No. EPA-HQ-OPP-2024-0154. Pesticide Product Registration

On behalf of the Nebraska Agri-Business Association, I extend our support of Bayer Crop Science's application for the registration of low-volatility Dicamba products. We support a science—and economic-based review that factors in the new technologies available for this product's use.

The Nebraska Agribusiness Association is a 69-year-old organization that represents agriculture input suppliers and agronomists across the state. Our members provide crop protection, fertilizer, and agronomic services to Nebraska farmers and ranchers.

In recent years, Nebraska producers have experienced a significant increase in weeds that are resistant to several modes of control. While balancing the need for sound agronomic practices and yields, producers need to have available proven products they can utilize. Low-volatility Dicamba products are an important component in a comprehensive weed control system.

While other chemistries exist, a diverse selection of crop protection products is vital to combat herbicide resistance and maintain long-term soil health. Palmer amaranth and water hemp have increasingly become a challenge for Nebraska farmers in their crop protection programs. The need for options in weed control will become more important moving forward to ensure farmers can maintain yields and limit the spread of resistant weed populations.

Nebraska has been a national leader in conservation tillage practices that reduce erosion, save water and nutrients, and improve soil health. Using reduced tillage as a result of effective crop protection products has helped to reduce producers' carbon footprint and increase our state's fields' role in carbon sequestration.

Our organization supports EPA's science-based process to register products and ask that the Agency act in a timely manner to ensure these products are available for the 2025 growing year and beyond so that long term agronomic strategies may be implemented by our nation's producers.

A handwritten signature in black ink that reads "Scott Merritt". The signature is stylized and cursive.

Scott Merritt  
President