



125 Slate Drive Suite #4

Bismarck, ND 58503

Tel: 701.223.4124

Fax: 701.223.4130

northerncanola.com

August 20, 2024

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

Submitted electronically via Regulations.gov

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

Dear Mr. Smith:

On behalf of the canola growers in the Northern Plains, the Northern Canola Growers Association submits these comments on 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 Northern Growers Canola Association, representing over 3,500 canola growers in this region, has a strong interest in developing the canola industry in the Northern Plains of the U.S. The NCGA's mission is to promote the establishment of conditions favorable to the production, marketing, processing, research, and use of canola.

While these comments are submitted in response to one submission of a low volatility dicamba product, we also support the proposed registrations of two other low volatility dicamba products awaiting registration.

Canola growers depend on crucial herbicide tools to combat weed problems in canola. Herbicide tolerance has allowed a dramatic shift in agricultural sustainability, allowing growers to increase yields and reduce soil disturbance. Herbicide tolerant (HT) crops are key enablers of conservation tillage practices which reduce fossil fuel usage, preserve topsoil, protect soil health, and reduce run-off and erosion from fields.

Canola production has realized these benefits from HT technologies, both directly through the rapid adoption of glufosinate and glyphosate-tolerant canola hybrids, and through the use of HT crops in rotation with canola, including corn and soybeans. The canola industry relies heavily on glufosinate as glufosinate-tolerant hybrids have the largest market share in the industry.

High adoption of HT crops and the associated herbicides has contributed to the development of resistance to glyphosate in populations of several weed species in key canola growing regions. North Dakota State University (NDSU) has documented kochia populations resistant to glyphosate in the region and notes that using dicamba in dicamba-tolerant soybeans has provided effective kochia control. Resistant weed populations now rank among the top production challenges for canola growers, both in their canola crops and in the rotational crops.

So far, no kochia resistance to glufosinate has been found, but farmers are going to have to use it wisely to preserve it. If glufosinate is lost due to resistance, canola growers will be forced to revert back to the use of older technology.

Glufosinate-resistant palmer amaranth has also been reported in several states. Glufosinate use has increased in recent years partly due to its compatibility with *Enlist* and *XtendFlex* soybean weed management programs. It is very important that growers are able to use multiple modes of action in combatting weed populations in all crops.

With weed resistance becoming a major issue, the NCGA has been working aggressively with NDSU herbicide specialists to identify new modes of action in canola. We have funded several years of crop tolerance studies conducted by North Dakota State University weed specialists.

In order to preserve weed control options in canola, growers must be able to leverage the ability to use dicamba in soybeans planted in rotation with canola. The use of dicamba in soybean fields is important for whole farm weed management for canola growers and growers of many other crops. If dicamba is no longer available for soybean growers, it will greatly increase selection pressure and the prevalence of glyphosate and glufosinate-resistant weeds, reducing the ability of canola growers to continue providing a healthy source of oil and meal.

We urge the EPA to offer post-emergent access to low-volatility dicamba in future registrations and to announce a registration decision as soon as possible so that growers and the supply chain can plan for continued proper crop rotations for the 2025 growing season. We thank you for your consideration of our request and look forward to engagement with EPA on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Coleman".

Barry Coleman
Executive Director