

State of Oklahoma Secretary of Agriculture

Mary Fallin Governor Jim Reese Secretary of Agriculture

September 12, 2018

The Honorable Andrew Wheeler Acting Administrator US Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, DC 20460

RE: Dicamba Registration Decision

Dear Acting Administrator Wheeler:

In your review of your decision to register Xtendimax with VaporGrip Technology (FPA Reg. No. 524-617), Engenia (EPA Reg. No. 7969-345), and FeXapan with VaporGrip Technology (EPA Reg. No. 352-913) and also with other potential registration decisions involving the registration of dicamba for the over-the-top (OTT) use on genetically modified crops for the 2019 growing season and beyond.

The undersigned Secretary, Commissioners, and Directors of Agricultures of the following states: Alabama, Colorado, Delaware, Georgia, Idaho, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, Tennessee, Texas, are opposed to a label imposed cutoff date. Due to differing geographic and climatic conditions, some states have multiple cutoff dates, some states plant well into July. This decision is best left to the states. Requiring states to ask for exceptions to the label is burdensome to the states and to EPA as well. The above mentioned states represent 72% of the US soybean production and 74% of US cotton production. America is experiencing some of the best crop production in years and technology, genetics, and weed control are all contributors to this production.

Due to the NASDA conference and the hurricane confirmation of support is provided by adding each director to this email. Thank you for your consideration of our comments.

Sincerely,

Jim Reese

Secretary of Agriculture State of Oklahoma

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