August xx, 2017

Administrator Scott Pruitt
United States Environmental Protection Agency
1200 Independence Ave., N.W.
Washington, DC 20460

Dear Administrator Pruitt:

We are writing to you today as (#x) farmers and (#y) farmer organizations deeply concerned about the epidemic of dicamba drift-related crop damage that is devastating various crops in many states.[1] The surge in drift damage happening now is directly linked to the application of the highly volatile herbicide, dicamba, in conjunction with the increased planting of Monsanto's Xtend soybean and cotton seeds this season. We appreciate your agency's acknowledgement of this issue, but assert that this is an extremely serious situation that should be addressed immediately.

On November 9, 2016, the U.S. Environmental Protection Agency approved a two-year conditional registration of Xtendimax, Monsanto's dicamba-based herbicide, to be used with Monsanto's Xtend line of seeds. **EPA has the authority to cancel this registration at any time. *We urge you to do so immediately*.**

The latest estimates from the University of Missouri point to more than 3.1 million acres of dicamba-damaged soybeans and over 2,000 individual reports of crop injury. State extensionists are especially alarmed at the rate of increase in dicamba-related crop injuries, which have escalated 25% over the past three weeks alone. Arkansas now estimates more than 900,000 acres of damaged soybean. Illinois reports 600,000 acres and Tennessee 400,000 acres of damaged soybeans, with many other vulnerable crops and types of vegetation affected.

In January 2014 – nearly two years before EPA registered Monsanto's Xtend soybean and cotton seeds in November, 2016 – a group of organizations representing farmer, farmworker and consumer concerns warned of the problems we foresaw. As we explained then:

- *Widespread planting of Monsanto's Xtend seeds will lead to a dramatic increase in dicamba use throughout the growing season (calculations based on USDA data projected increases of from 235 to 1,700 fold in soybeans alone). The scale of these projected increases poses a grave threat to natural and agricultural environments and to human health.*

[1] Currently affected states include Arkansas, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, Nebraska, North Dakota, North Carolina, Ohio, Pennsylvania, Tennessee and Virginia.

- *Particularly in summer temperatures, dicamba is extremely likely to volatilize and drift from target crops, harming broadleaf plants, particularly food crops (vines, fruit trees, vegetables) and non-herbicide resistant soy and cotton. (Even glyphosate – basically non-volatile – often drifts due to wide-scale use, varied environmental conditions and human error, regardless of training, equipment optimization, and label directions in place.)*

- *Non-agricultural broadleaf plants—including a wide diversity of plants growing in and around our fields, as well as in natural ecosystems—are also vulnerable to damage whenever dicamba volatilizes and drifts.*

- *The health of rural communities is at risk; dicamba exposure has been associated with increased rates of non-Hodgkins lymphoma and other cancers.*

- *Increased dicamba usage will also speed the emergence and spread of dicamba-resistant "superweeds," just as the widespread planting of Monsanto's Roundup-Ready seeds has led to a rise in glyphosate-resistant weeds now covering more than 90 million acres of U.S. farmland.*

We are now witnessing many of these problems at an even greater scale than previously predicted. With millions of acres of dicamba damage already reported across 18 states, the likelihood that natural ecosystems and non-agricultural plants have already been harmed is almost certain.

Today's dicamba drift problem cannot be solved by label restrictions or formulation modification. Strict label restrictions are necessary, but the on-the-ground reality is that with frequently changing weather and wind conditions and other factors, these restrictions are almost impossible for growers and applicators to follow, the vast majority of the time. Indeed, precisely because Xtendimax is intended to be used on Xtend seeds, i.e. *throughout the higher temperatures of the growing season*—this product will continue to volatilize and drift, causing damage to both natural and managed agricultural ecosystems, and putting our health and livelihoods at risk.

Allowing Xtendimax to stay on the market essentially guarantees the spread of dicamba drift and its associated environmental and health harms. **We urge EPA to protect our health, livelihoods and our working and natural environments, and revoke registration of Xtendimax immediately.**

Thank you for considering this urgent request. Please contact Quinton Robinson, National Family Farm Coalition Policy Advisor, to respond to your questions or concerns (m: 703/975-4466).

Sincerely,
[name/title/farm]