

August xx, 2017

The Honorable Sonny Perdue
Secretary
United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Perdue:

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.

USDA has authority to rescind its deregulation of Xtend seeds, in light of the harms to agricultural production and farmers' livelihoods that are now occurring. *We urge you to take immediate action to do so.*

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. State extensionists in Arkansas now estimate 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 – a year before the U.S. Department of Agriculture deregulated Monsanto's genetically engineered (GE) Xtend soybean and cotton seeds on January 13, 2015 – 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 after vulnerable crops have emerged and throughout the growing season (calculations based on USDA data project an over 200-fold increase in dicamba use in soybeans alone).*
- *Particularly in summer temperatures, dicamba is likely to volatilize and drift from target crops, harming broadleaf plants, including 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.)*

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.

- *Non-GMO, specialty crop and organic farmers will lose yield, crops, income, certification and potential markets, resulting in an economic unraveling of already-stressed rural communities.*
- *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;*
- *Increased application of dicamba – inextricably tied to Monsanto’s Xtend seed system – will result in more toxins in the environment and increased risk of exposure by livestock, wildlife (including pollinators and fish) and humans.*

We are now witnessing many of the above problems at an even greater scale than previously predicted. Some farmers have experienced dicamba drift damage first hand and are concerned that current crop insurance contracts will fail to cover the full extent of the losses they’ve sustained. Furthermore, many farmers who received direct operating loans from the USDA Farm Service Agency loan program are at risk of not filling loan obligations in the absence of a viable marketable crop.

Allowing the Xtend technology to stay on the market essentially guarantees the spread of dicamba drift damaging crop acreage across the Midwest and South, threatening American farms and livelihoods. Meanwhile, farmers seeking to diversify their farms – a key approach to rebuilding soil health, sustainably managing insect and weed pests, and reducing economic risk – will have fewer options.

Under the noxious weed provision of the Plant Protection Act (PPA 2000), USDA has authority to evaluate and regulate GE seeds according to a broad range of direct and indirect harms, including economic harm to farmers or the public. Beyond this, the agency has a broader mandate and responsibility to protect and support the public interest—particularly the livelihoods of all farmers including non-GMO, specialty crop growers and organic farmers, the well-being of our rural communities and the long-term viability and sustainability of our food and farming system.

America's farmers cannot afford to wait until the industry provides a solution. **We urge the U.S. Department of Agriculture to cancel registration of Monsanto’s dicamba-resistant soybean and cotton seeds, effective immediately. In so doing, USDA would fulfill its mandate to “help rural America thrive.”**

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]