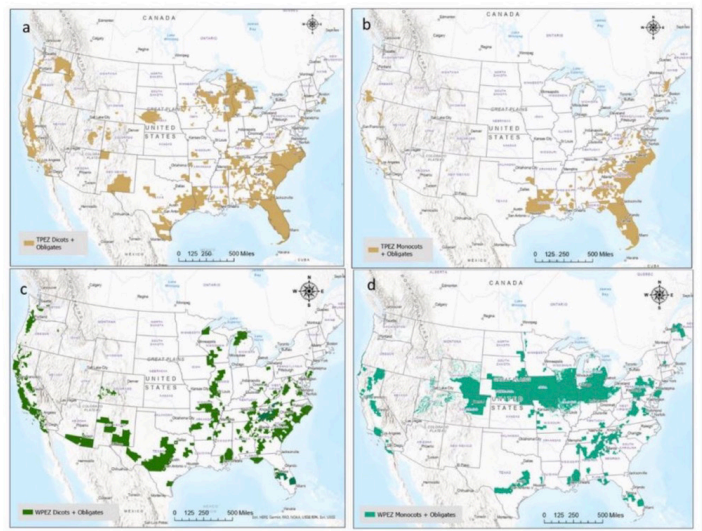


## Ask EPA to Withdraw Herbicide Proposal

EPA has proposed a new herbicide strategy and is taking public comments. The [strategy](#) would require significant use restrictions and mitigations on most all agricultural herbicide uses in the United States. Growers located in pesticide use limitation areas (PULAs-shown here) could be subject to greater restrictions.

Many of the restrictions outlined in the EPA's proposal will be unworkable, forcing growers to adopt outdated cropping practices that are costly, burdensome, and not relevant to 21st century agriculture. Without meaningful access to herbicides, many farming operations could lose access to crop insurance and operational loans.

Farmers and ranchers are urged to [sign](#) the following letter by 11:59 p.m. EST, Friday, October 20, 2023, to ask EPA to withdraw the proposal.



October 22, 2023

Jan Matuszko  
Director  
Environmental Fate and Effects Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Dear Ms. Matuszko,

As farmers, ranchers, pesticide applicators, and agricultural producers, we write to express our grave concern with EPA's draft herbicide strategy framework (EPA-HQ-OPP-2023-0365). As proposed, this complex framework would impose enormous new regulatory burdens and uncertainties on nearly every agricultural herbicide user in the contiguous lower 48 states. For many producers there are not sufficient options to comply with the proposal, while for

others it would impose significant costs on their operations. This will not only harm our nation's rural communities but will also negatively affect the U.S. and global consumers who rely on our ability to produce affordable and sustainable food, fuel, fiber, and other goods. We strongly urge EPA to withdraw this complicated, harmful, and unworkable strategy.

Herbicides are vitally important to our operations for protecting crops and grazing lands from economically-damaging weeds and maintaining important conservation practices – including many of the practices EPA would have producers adopt via this strategy to protect endangered species. Weeds are destructive pests which can compete with crops for limited soil moisture, nutrients, sunlight, and other vital inputs. They can also harbor other destructive pests, such as rodents and damaging insects. If not properly managed, weeds can cause catastrophic yield losses and even total crop failure. However, we are greatly concerned the herbicide strategy as proposed would significantly undermine producer access to herbicides and their important production and environmental benefits.

The strategy is incredibly complex and will be difficult for individual producers and applicators to even determine if lands are under regulation or what their compliance obligations will be. Many of the exemptions EPA proposes are not practical and will apply to few agricultural lands, leaving most under regulation even if herbicide use at those sites does not pose a genuine risk to endangered species. Additionally, the agency gives very few reasonable compliance options. Most of the runoff reduction practices EPA offers are not suitable for certain regions or crop types, leaving many producers simply unable to comply. For individual producers with sufficient compliance options, the practices proposed can be very costly and might require the annual investment of millions of dollars across hundreds or thousands of their acres to continue using herbicides. The significant spray drift buffers required by the proposal will also leave enormous swaths of farmland unprotected from damaging pests. The practical effect of this proposal will be that many farms and ranches will not be able to continue to access or meaningfully use herbicides in their operations, which can reasonably be expected to contribute to significant crop loss and harm to our businesses.

Without continued meaningful access to herbicides, which this proposal seriously jeopardizes, many of our operations will not remain viable. If we are unable to protect our crops and grazing lands from devastating weed pests, the risk posed to our operations will increase significantly, undermining our ability to access crop insurance or financing essential to our continued operation. Given this proposal would apply across the entire lower 48 states, we expect rural communities from coast to coast will greatly suffer from its economic impacts.