



TENNESSEE FARM BUREAU FEDERATION

February 8, 2024

The Honorable Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Dear Administrator Regan,

The Tennessee Farm Bureau Federation (TFBF) is a general farm organization of over 690,000 members whose purpose is to represent the many diverse commodity producers across Tennessee. On behalf of our member producers, we are extremely disappointed in the ruling by the Arizona Federal court to vacate the dicamba label for over-the-top (OTT) usage.

This decision comes at a very difficult time for farmers across Tennessee. Most producers have already made their cropping decisions, secured seed and crop protection products, and are doing preparatory field work for the 2024 growing season. Farmers have made significant investments, often while using financial credit, to prepare for this crop season. Farmers' decisions were made well before Arizona's Federal court reached a verdict and their plans were based on OTT dicamba being available for use this year. With little to no time to purchase alternatives and change inputs before the 2024 planting season, the loss of the dicamba label places thousands of acres of row crops in Tennessee at risk of decreased or completely lost production this year. These potential losses would significantly affect farmers' financial security, negatively impact agricultural creditors, and would have extensive impact on the nation's food supply.

In addition, the United States Department of Agriculture Economic Research Service released a forecast showing net farm income is expected to decline by 25.8 percent compared to 2023. The loss of the dicamba label will exacerbate an already difficult and declining economic situation for farmers.

Simply put, this decision could put many Tennessee farmers out of business.

In light of this, we strongly urge the Environmental Protection Agency (EPA) to grant a flexible existing stocks order for dicamba which allows for access and application of OTT products already in the retail supply chain. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Eric Mayberry".

Eric Mayberry
President
Tennessee Farm Bureau Federation