



TENNESSEE FARM BUREAU FEDERATION

June 19, 2025

Marietta Echeverria
Mail Code 7505P
Registration Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket No. EPA-HQ-OPP-2021-0435; Public Participation for New Active Ingredient Diflufenican

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments regarding the proposed registration of the active ingredient diflufenican, submitted by Bayer CropScience. On behalf of our member producers, we support the registration of this active ingredient used to combat broad leaf weeds in corn and soybeans.

As a broad-spectrum herbicide, diflufenican can be used for preplant and preemergence control of broad leaf weeds, such as waterhemp, Palmer amaranth, and other pigweed species threatening yields in corn and soybean fields. New technologies to mitigate these weed pressures are crucial for corn and soybean producers to grow the highest quality product in the most efficient manner possible. Additionally, with the ever-growing challenge of weed resistance, particularly in pigweed species like Palmer amaranth, farmers need every tool available to effectively address weed pressures. The addition of diflufenican to a farmer's Integrated Pest Management and Resistance Management programs will further propel them forward in addressing today's agronomic challenges.

During the risk assessment process, the Environmental Protection Agency (EPA) determined diflufenican poses no risks to humans, non-listed birds, reptiles, terrestrial-phase amphibians, bees, aquatic and non-bee terrestrial invertebrates, and freshwater and estuarine/marine fish. However, during the draft biological evaluation, EPA classified diflufenican as Likely to Adversely Affect (LAA) under the Endangered Species Act (ESA) – meaning EPA expects at least one listed plant or animal species may be exposed to diflufenican at a sufficient level to have an adverse effect. As a result of this determination, EPA has proposed requiring users of diflufenican to achieve a set number of mitigation measures before using the product. While we support the use of

conservation practices to protect non-target species, TFBF encourages EPA to ensure the recommended mitigation measures are workable, cost-effective, and flexible enough to work on different farm types, sizes, and locations.

Growers need every viable option to respond to weed pressures and combat persisting weed resistance issues. New options provide a more comprehensive weed control program for farmers and prevent further weed resistance risks. For these reasons, TFBF encourages EPA to approve a label for diflufenican.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry". The signature is written in black ink and is positioned below the word "Sincerely,".

Eric Mayberry
President
Tennessee Farm Bureau Federation