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Office of Administrative Law  
United States Environment Protection Agency  
FIFRA-HQ-2022-0002

Re: Objection to suspension of DCPA

To Whom it May Concern:

On behalf of the Western Plant Health Association (WPH) I am submitting this letter to support the continued registration of Dacthal herbicide in the U.S. WPH represents the interests of pesticide and fertilizer manufacturers, agricultural biotechnology providers, and agricultural retailers in California, Arizona, and Hawaii.

Dacthal is an essential tool for the control of yield-robbing grasses and broadleaf weeds in onions and cole crops and is known to deliver high crop safety. Dacthal is currently utilized to produce crops in all major vegetable-growing regions of the U.S. including California, Georgia, Florida, Texas, New Jersey, and the Pacific Northwest.

Products like Dacthal are vital because few options are currently available in California for these key crops. New chemical products are rare due to the high cost of R&D, and the extended California evaluation timelines for the registration of new products. California's growers will be disadvantaged both agronomically and economically if they were to lose access to Dacthal. As well as the risk of reduced yields, many growers will have to resort to hand-weeding, which would entail bringing on additional labor that is expensive and is in short supply or even nonexistent in the state.

Preserving the registration of Dacthal will help preserve a positive economic impact for California's vegetable growers as well a continuing supply of affordable and healthy vegetables for consumers in the state and across the country. As a result, WPH supports the continued registration of Dacthal for use in California's commercial vegetable production fields.

Sincerely,

KAHN, SOARES & CONWAY, LLP

Ann M. Grottveit

AMG/ehs

cc: Western Plant Health Association