Ohio
AgriBusiness Association

August 9, 2012

Docket No. APHIS – 2012 – 0047
Regulatory Analysis and Development
PPD, APHIS, Station 3A – 03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Docket No. APHIS – 2012 – 0047

The Ohio AgriBusiness Association (OABA) appreciates the opportunity to provide comments in support of farmers having a choice to use safe and valuable new agricultural technologies to increase yields and keep their farms profitable. Soybeans engineered for tolerance to the herbicides glyphosate and dicamba are one example of a new agricultural technology. Farmers today need multiple mode-of-action weed management tools. Dicamba tolerance would be a valuable addition to the existing soybean weed control options to maximize yield potential. Dicamba has been used in crops for many decades in the U.S. and continues to be effective on major broadleaf weeds.

Farmers have proven they are able to use different application techniques and equipment for different types of pesticides to ensure proper performance of the product as well as on-target application. These include, but are not limited to, application techniques, equipment settings, nozzle selection and consideration of environmental conditions during application, such as wind speed.

The U.S. soybean processing and feed industries, along with the growing U.S. soybean export markets, are very healthy segments of our economy. The availability of these new and effective soybean production tools is vital to maintaining that health. It is important that USDA follow through on its commitment to U.S. farmers to conduct timely, science-based reviews of new technologies, such as dicamba-tolerant soybeans. This is necessary to support innovation and access to technology that keeps U.S. agriculture productive, sustainable and globally competitive.

I would like to express my appreciation for the opportunity to submit comments on behalf of our members, famers and the agricultural industry as a whole.

Sincerely,

Christopher Henney
President & CEO

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