



For Immediate Release

American Agri-Women Oppose EPA Herbicide Strategy Proposal

Crookston, MN. (AgPR) Oct. 24, 2023 – American Agri-Women (AAW), a coalition of farmers, ranchers, and women in agribusiness from across the nation, expressed grave concerns with the EPA's Draft Herbicide Strategy Framework to Reduce Exposure of Federally Listed Endangered and Threatened Species (ESA) and Designated Critical Habitats from the Use of Conventional Agricultural Herbicides.

In an impassioned letter to the EPA, AAW joined with agricultural stakeholders to seek EPA's withdrawal of the strategy because of the likely widespread ramifications on food and feed production and conservation practices.

The group raised a multitude of concerns, including the intricacy of the proposal that makes it challenging for producers and applicators to understand their regulatory requirements and achieve practical compliance.

AAW President Heather Hampton+Knodle said the maps of proposed trial areas appear nearly impossible to pin down. "It looks like splatter paint you might see in an art gallery. It's unrealistic to require retailers and producers to 'color' within the lines as they are proposed." The coalition voiced concerns regarding the lack of affordable compliance options for growers, which could result in significant financial burdens for many farms and even lead some to an inability to comply, jeopardizing their access to indispensable herbicides.

Hampton+Knodle cited AAW policy on endangered species by saying deeper concerns underlay the entire proposal. "For years, we've been concerned about how critical habitat designations are defined and how species are listed and not delisted. We are concerned that the science on each product's chemistry's individual impacts on species and subspecies is nowhere near what is needed to determine final boundaries and management requirements. This action is premature. The agency should first focus on understanding the chemistry."

The importance of herbicides in agriculture is highlighted, as they are crucial tools for weed management. Weeds can cause significant yield reductions, and the economic impact of leaving them unmanaged would be substantial. The stakeholders stress the necessity of using

a variety of herbicides with different modes of action to combat herbicide-resistant weeds effectively.

The proposal's erosion/runoff and spray drift compliance obligations are also criticized for their complexity and impracticality. The stakeholders argue that determining compliance obligations in these areas is overly complicated, and it may result in producers favoring herbicides with higher compliance point requirements, which could exacerbate herbicide resistance issues.

Implementation of the herbicide strategy is expected to be costly for many agricultural herbicide users, especially for those operating in pesticide use limitation areas (PULAs). The proposal's suggested erosion/runoff mitigation practices may not be practical for various crops, and some might not have enough options to achieve compliance. Furthermore, the stakeholders express concerns that some mitigation practices could inadvertently incentivize the use of herbicides in ways that accelerate herbicide resistance issues.

In conclusion, the stakeholders emphasize that while they support the EPA in meeting its ESA obligations, they oppose the current herbicide strategy proposal and urge the agency to consider alternative means of achieving compliance that do not jeopardize agricultural operations and conservation efforts. They call for a more practical, science-based approach to safeguard the interests of farmers and the environment.

About American Agri-Women

American Agri-Women (AAW) is the national coalition of farm, ranch, and agribusiness women's organizations and state and commodity affiliate organizations. AAW's Vision for the 2023 Farm Bill can be found at www.americanagriwomen.org. AAW promotes the welfare of our national security through safe and reliable food, fiber and energy supply. Since 1974, AAW members have worked together to educate consumers, advocate for agriculture, and offer networking and professional development opportunities. **Go to the AAW website for more information and to join www.americanagriwomen.org.** Find AAW on social media at: Facebook.com/AgriWomen/, Twitter.com/Women4Ag/ ([@Women4Ag](https://Twitter.com/Women4Ag/)) and Instagram.com/americanagriwomen/ ([@americanagriwomen](https://Instagram.com/americanagriwomen/)). #standupspeakout4ag

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