



August 14, 2018

RE: Efficacy of Applicator Training to Minimize Off-Target Movement of Dicamba Herbicide in Major U.S. Soybean Producing States

The [American Association of Pesticide Safety Educators](http://www.aapse.org) is dedicated to protecting human health and the environment by promoting high quality pesticide education. Our membership consists of university educators, state/federal regulators, and private industry. Our members would like to comment on the value of the specialized applicator training that EPA imposed in mitigating the off-target movement of dicamba herbicide applied to Dicamba Tolerant Crops in 2018.

Land Grant Universities, state regulatory agencies, and private industry have mounted an unprecedented educational campaign targeting users of this technology. We believe strongly that education is essential in addressing all aspects of pesticide use. These efforts have been only marginally successful in spite of the thousands of hours of training devoted to the stewardship of Dicamba products. The amount of off-target damage observed in 2017 and now in 2018 remains unacceptably high throughout much of the Midwest and Southern states. We urge EPA to look in other areas, besides more training, to solve the serious problem we face with off-target movement of Dicamba used on soybeans/cotton as the products are being reassessed by the agency.

We appreciate the opportunity to comment on this issue. If we can be of further assistance, please do not hesitate to call upon us.

Sincerely,

On behalf of the American Association of Pesticide Educators
AAPSE President Elect
Chair of the Issues and Evaluations Committee

cc: Tony Cofer, AAPCO President
Liza Fleeson Trossbach, SFIREG Chairperson