



November 8, 2021

Marietta Echeverria  
Acting Director  
Registration Division  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
United States Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001  
703-305-8578  
echeverria.marietta@epa.gov

**Subject: Impact of Dicamba on the Texas Wine Industry**

Dear Ms. Echeverria:

I write on behalf of the Texas Wine and Grape Growers Association ([www.txwines.org](http://www.txwines.org)). Our organization's mission is to promote the production and appreciation of premium grapes and fine wines from Texas and to represent a unified state industry with common marketing, governmental, and educational goals.

The Texas High Plains, with its 3,000 acres of vineyards and 3 million grape vines, is the largest wine grape production area in the state. It provides roughly 85 percent of the fruit necessary for Texas' \$13.1 billion wine industry, which in turn is the fifth largest in the country. As our growers have shown over the decades, the Texas High Plains is an optimal place for growing quality wine grapes – the region's elevation, moisture levels, and temperatures have helped produce many award-winning wines. But the Texas High Plains growers are also surrounded by 3 million acres of cotton farms, earning the region the nickname as the "biggest cotton patch in the United States."

In recent years, repeated use of over-the-top dicamba on dicamba-tolerant cotton in the Texas High Plains has decimated local grape vines, and with it the heart of the Texas wine industry. Reports suggest that over two million acres of cotton in the region are planted to the dicamba-tolerant trait. The dicamba-tolerant seed system has decimated what had been a rapidly growing industry in the Texas High Plains and source of local pride.

The highly volatile herbicide has drifted onto grape vines across the region, leaving them struggling to fill their canopies. This phenomenon has produced devastating effects, including cupped leaves, withered vines, sunburned grapes, slowed sugar accumulation, reduced winter hardiness, and a massive drop in annual grape production. Dicamba damage can be found in every vineyard across the region, with some vineyards experiencing up to a 90% loss in production.



Even more significant is the cumulative impact of vines getting hit with dicamba exposures year after year. Many vines are unhealthy or have died. Young vines are stunted before they ever have a chance to thrive. Because each vine is a 20-to-30-year investment, dozens of our members say their businesses will not survive without immediate and drastic help. The overall economic impact is staggering.

All of this was anticipated by Bayer, its corporate predecessor, Monsanto, and its research partner BASF, when they developed the dicamba-tolerant seed system. Now as High Plains cotton growers continue to apply the herbicide to dicamba-tolerant cotton, it has become clear that the EPA's mandated label changes and revised application methods have had no impact. Our growers are still suffering significant damage from the movement of vaporized dicamba, even when applied to cotton crops miles away. The scope of damage during the 2021 growing season was as bad, if not worse, than in preceding years.

Earlier this year, 57 Texas High Plains grape growers and four related processing companies filed a lawsuit against Bayer and BASF to seek redress for the vines and vineyards that have been destroyed by the defective dicamba-tolerant seed system. The lawsuit estimates the economic harm to the Texas High Plains grape growers to be in the hundreds of millions of dollars. Even while the suit is pending, Bayer and BASF continue to market the defective product as "safe" for neighboring crops and blame unrelated factors for its obvious effects.

Therefore, since over-the-top dicamba use continues to pose an existential economic threat to our members, the Texas Wine and Grape Growers Association requests that the EPA immediately cancel the registration of all dicamba products that are approved for over-the-top application to dicamba tolerant cotton until a solution can be found. Our members can no longer withstand such a sustained environmental and economic assault to their livelihoods.

Sincerely,

A handwritten signature in black ink, appearing to read "Roxanne Myers", written in a cursive style.

Roxanne Myers  
President  
Texas Wine and Grape Growers' Association