



July 12, 2024

The Honorable Gina Raimondo
Secretary
Department of Commerce
1401 Constitution Avenue N.W.
Washington, D.C. 20230

Dear Secretary Raimondo:

We write concerning the antidumping and countervailing petition filed by Corteva regarding 2,4-D herbicide imports from China and India. As farmers and leaders of agriculture industries representing major U.S. commodities, we ask that you consider impacts to farmers when calculating duties as a part of this investigation.

Farmers depend on timely and affordable access to herbicides for their growing season. 2,4-D herbicides are widely used by corn, soybean, wheat, barley, sorghum, and durum growers across the United States, as well as in residential lawn and garden care. Herbicides containing 2,4-D are an effective tool used to block unwanted and harmful weeds from choking healthy crops. Applying 2,4-D herbicides allows farmers to adopt and maintain conservation practices like no-till, which greatly benefit soil health.

Restricting imports of 2,4-D will have wide ranging consequences for farmers. American farmers cannot solely rely on Corteva, which is the only domestic supplier of 2,4-D, because there is not enough supply to meet to demand. This will cause availability shortages due to the disrupted supply chain. Additionally, restricting the availability of 2,4-D will be very harmful at a time when farmers are grappling with rising input costs and low commodity prices. The U.S. Department of Agriculture (USDA) projects total farm production cash expenses for 2024 at a record high level. Concurrently, crop values are declining: USDA predicts total cash receipts in nominal value for crops in 2024 will be 11.7% lower than 2022.

Farmers are unable to incur additional costs in what is already a period of tight margins. This case has the potential to forcibly cause farmers to cut budgets, which will impact their ability to have successful yields and will further disrupt the economic health of local economies. While we are appreciative that companies like Corteva have invested in new technologies like seed traits and herbicides that allow us to be efficient producers, the reality is that farmers need options from a variety of suppliers to meet their individual needs. Because farmers depend on timely access to inputs during planting and harvesting seasons, this case can be very disruptive to our affected growers.

Given the multifold effects that duties on 2,4-D will have on farmers and the broader agriculture industry, we urge you to appropriately consider these impacts when calculating preliminary duties and choose the lowest possible rate to minimize harm. Affirmative findings in these investigations will cause farmers to be saddled with supply shortages and delays, significant financial strain, and lower yields. We implore you not to do not do this. The harm claimed by Corteva does not compare to the harm that America's growers will incur should you apply high duties to these imports.

We stand ready to provide additional detail and answer questions as needed. We appreciate your prompt attention to our concerns regarding this case.

Sincerely,

Harold Wolle
President
National Corn Growers Association

Josh Gackle
President
American Soybean Association

Keeff Felty
President
National Association of Wheat Growers

Chris Engelstad
President
National Barley Growers Association

Craig Meeker
Chairman
National Sorghum Producers

Steve Perdue
President
U.S. Durum Growers Association