

INVESTIGATION NOS. 701-TA-710-711 AND 731-TA-1673-1674:  
2,4-DICHLOROPHENOXYACETIC ACID (“2,4-D”) FROM CHINA & INDIA  
March 31, 2025

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TESTIMONY OF  
KENNETH HARTMAN, JR.  
PRESIDENT  
NATIONAL CORN GROWERS ASSOCIATION

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1. Good afternoon. My name is Kenneth Hartman, Jr. Thank you for the opportunity to appear before you today.
2. I’m a fifth-generation farmer from Waterloo, Illinois and have worked on the farm all my life. I professionally farm corn, soybeans, and wheat with my wife and daughters.
3. I currently serve as the President of the National Corn Growers Association (“NCGA”). I’ve been on the Corn Board since 2017 serving in multiple positions. Previously, I was the President of the Illinois Corn Growers Association.
4. NCGA represents the interests of over 300,000 corn growers. We aim to protect and advance the interests of corn growers. This includes accessing the products they need to grow corn that feeds millions of Americans.
5. NCGA testified before Commission staff last year at the preliminary stage. Thank you for having us here again to explain why new tariffs on 2,4-D would be very harmful to American farmers.

**Herbicides are Important Tools for Farmers**

6. Let me start by explaining how farmers use herbicides to protect our crops.
7. Herbicides kill weeds, which compete with crops for water, nutrients, and space. Without reliable access to herbicides, farmers stand to lose significant crop yield to weed damage. Herbicides are one of our most important tools for a successful yield.

8. To prevent weeds from competing with the crops, farmers can use herbicides at three different times during the year. First, farmers often spray before seeds are planted to ensure that the seedbed is clean and that weeds are controlled before they have a chance to grow. This is called “burndown.”
9. Second, farmers may also spray after the seed is planted but before it sprouts, during what is called “pre-emergence.”
10. Third and finally, farmers spray as the plant is growing. This is “post-emergence” application.

### **2,4-D is an Essential Herbicide Tool**

11. Next, I’d like to speak about how 2,4-D is a critical herbicide tool for farmers.
12. First, 2,4-D is a growth regulator that targets broadleaf weeds—which is a type of weed that causes significant harm to corn. 2,4-D has a minimal effect on grasses. This makes 2,4-D useful for corn, which is a grass, because it will kill the weeds but not the corn plants.
13. Second, 2,4-D application during burndown is effective to control winter and summer broadleaf weeds, which need to be managed early.
14. Third, farmers like to use 2,4-D because it’s tried and true. 2,4-D does not lead to weed resistance in the same way that some other herbicides do. 2,4-D is a great stand-alone product and a product that can be combined with other herbicides that are more prone to weed-resistance, like glyphosate.
15. Fourth, 2,4-D is more environmentally friendly and climate-smart than the alternative, which is tilling. Tilling is an equipment-driven approach that mechanically breaks up the soil to destroy weeds. No-till farming uses herbicides to kill weeds while minimizing soil disturbances. This is important because keeping soil intact reduces soil erosion. This limits the release of greenhouse gas emissions and maximizes moisture conservation.
16. Farmers need herbicides for no-till farming. Without this, many farmers are concerned that they would need to return to tillage farming. Farmers have to protect their crops one way or another. Unfortunately, just one tillage pass reverses environmental gains made over years of no-till farming, immediately releasing stored greenhouse gasses and moisture. This would result in

increased input costs for labor, equipment, and fuel, squeezing farmers who are already in challenging economic conditions.

### **Corteva Does Not Need Trade Protection**

17. I'd now like to speak a bit about Corteva. We very much value Corteva and the important products that it has brought to the market that help farmers. Corteva's Enlist seeds and herbicide products are good products that meet the needs of many farmers. Corteva has been very successful with selling its products at high prices.
18. However, Corteva does not need trade protection, as its business is already highly protected. Corteva is the only domestic supplier of 2,4-D acid. It holds significant and consistently increasing market share in soybean, corn, and cotton markets with its premium 2,4-D-resistant seeds and paired herbicide products. It develops these products by internally consuming its 2,4-D acid.
19. Importantly, Corteva's 2,4-D herbicides are the *only* herbicides that are permitted for use for their 2,4-D seeds after planting. Farmers who use Corteva Enlist PowerCore corn seeds cannot use any other 2,4-D herbicide for pre-emergent or post-emergent spraying—they are locked into using Corteva's products. For this reason, Corteva has significant market protection.
20. This case reminds us of the UAN investigation from a few years ago where we appeared. That case, like this one, involved a domestic supplier that had a strongly protected market position. You made a negative determination in that case. You should do so again in this one.

### **AD/CVD Duties Will Harm Corn Growers**

21. I'll end with this. These are difficult times for corn growers. Corn prices are down 40% since 2022 and costs of farming, including inputs like herbicides, are at all-time highs. New herbicide tools are slow to come to the market. Weed resistance to herbicides is growing. For all these reasons, we simply must have access to dependable crop protection tools like 2,4-D. Placing new duties on 2,4-D would set American farmers back even further. On behalf of 300,000 American corn farmers, I ask you to make a negative determination in this case.

22. Thank you.

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I have read the document, to the best of my knowledge and belief the statements contained therein are true, and I am authorized to sign it.

Dated: March 31, 2025

/s/ Kenneth Hartman, Jr.  
Kenneth Hartman, Jr.