



September 6, 2022

Edward Messina
Director – Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Director Messina,

The National Association of Wheat Growers (NAWG) and National Barley Growers Association (NBGA) support the timely registration of Eastman Chemical Company's new product, Adjust SL, that is currently being undertaken by the Environmental Protection Agency (EPA). It is critical that new, environmentally sound, products are registered in a timely fashion, and we urge EPA to expedite action so that the product registration might be finished in time for farmers to utilize them for the next growing season.

NAWG is a federation of 20 state wheat grower associations that work to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded and works in areas as diverse as federal farm policy, environmental regulation, the future commercialization of emerging technologies in wheat, and uniting the wheat industry around common goals. Likewise, the National Barley Growers Association (NBGA) is comprised of state grower organizations and industry stakeholders with a mission to enhance and maintain the profitability of the U.S. barley industry.

Wheat and barley farmers are continually looking to better navigate today's threats to production in relation to climate resiliency, uncertainty, and market forces. As such, we support research and development of environmentally sound crop protection products. There is already a significant lag time from when a farmer is faced with a problem and when a viable solution to that problem is researched and developed. It is imperative that federal agencies work through the registration processes to allow new products to be available for purchase by farmers.

Plant growth regulators protect farmers from lodging, a problem increasingly faced with severe weather occurrences, which causes increased fuel consumption, decreases in yield, and threatens increased disease prevalence. By using the product, farmers can expect better plant development in the root, crown, and stems, which make for a more uniform head that allows farmers to harvest the crop more efficiently. This more uniform head also allows for the farmer to leave additional residue on their field. Further, the active ingredient in Adjust SL, chlormequat chloride, is already approved for use in the United States on ornamentals and already has import tolerances of 3 ppm on wheat and 2 ppm for barley.



**National
Barley
Growers
Association**

It is our understanding that the registration review process of this product has been continually delayed, with EPA extending the timeline for review. As a growth regulator best applied during feekes 4-6 of wheat development, a significant delay in registration would mean that growers would have to wait an entire growing season before have access to this product.

Products like Adjust SL help farmers adapt to new conditions in the face of climate change while improving their efficiency and yields. We encourage you to work with EPA and express the urgency of getting new products through registration to be utilized in the upcoming growing season.

Thank you,

Nicole Berg
NAWG President

Greg Kessel
NBGA President

CC: Kimberly Nesci, Director, USDA Office of Pest Management Policy