



April 18, 2024

The Honorable David S. Johanson  
U.S. International Trade Commission  
500 E Street, S.W.  
Washington, DC 20436

Dear Chairman Johanson:

As farmers and leaders of some of the leading commodity groups in the nation, we write to express our concern with Corteva Agribusiness's petition to place antidumping and countervailing duties on imports of the herbicide 2,4-D shipped from India and China. If the U.S. International Trade Commission votes to continue this case beyond the preliminary stage, farmers across the country could soon find it difficult to access critical supplies for these products.

Herbicides are one of the most significant inputs during the growing season, and 2,4-D-based herbicide products are important options for farmers of many different crops. The imports covered by this case are the large majority of sources of supply other than Corteva, which is the only U.S. supplier. To put it simply, America's farmers cannot rely upon a sole domestic supplier of 2,4-D to meet nearly all the market's needs, and imports are needed to meet the majority of market needs.

Duties on these products would intensify what is already a difficult period for many growers as key input costs continue to increase. The U.S. Department of Agriculture projects total farm production cash expenses for 2024 at a record high level<sup>1</sup>. At the same time, crop values are declining. USDA projects total cash receipts for crops in 2024 will be 11.7% lower than 2022<sup>2</sup>. This petition, which seeks to limit imports of a critical farm input, only makes a rough environment even more challenging.

There is no way for farmers to make up for the additional costs, as we are price takers, not makers, in selling crops. If this case moves forward, we will be forced to make budget cuts that can impact our operations as well as our local economies. To put it simply, the weight of a dispute between multinational companies would fall directly on the shoulders of growers.

We are thankful companies like Corteva have invested in new technologies, including seed traits and herbicides, that allow us to continue producing more effectively every year. However, farmers must have access to multiple suppliers to plant and harvest our crops. If this case goes forward, Corteva will control nearly all the 2,4-D market.

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<https://www.ers.usda.gov/data-products/farm-income-and-wealth-statistics/data-files-u-s-and-state-level-farm-income-and-wealth-statistics/>

<sup>2</sup> See 1.

Given the significant burden these proposed tariffs would place on America's farmers and rural communities, including supply shortages and delays, we encourage you to vote negative at the preliminary stage of this investigation on Corteva's petition. Corteva's material damage, as claimed by the company, does not come close to the harm this case will cause American farmers.

Should you have any questions regarding our concerns, please do not hesitate to contact us. We would be happy to meet with you and discuss this issue in more detail.

Sincerely,

Josh Gackle  
President  
American Soybean Association

Keeff Felty  
President  
National Association of Wheat Growers

Chris Engelstad  
President  
National Barley Growers Association

Harold Wolle  
President  
National Corn Growers Association

Craig Meeker  
Chairman  
National Sorghum Producers

Steve Perdue  
President  
U.S. Durum Growers Association