

Testimony of Harold Wolle
President of the Corn Board of the National Corn Growers Association
Investigation Nos. 701-TA-710-711 and 731-TA-1673-1674:
2,4-Dichlorophenoxyacetic Avid (“2,4-D”) from China and India

Good afternoon, my name is Harold Wolle. Thank you for the opportunity to appear before you today.

Introduction

I am a sixth-generation farmer from Madelia, Minnesota. I farm with my son, who represents the seventh generation of Wolle farmers in Minnesota. We raise yellow corn and soybeans.

I currently serve as the President of the Corn Board of the National Corn Growers Association, and I’ve been on the Board since 2018 serving in multiple positions. I was previously the President of the Minnesota Corn Growers Association.

Founded in 1957, the National Corn Growers Association (“NCGA”) is a farmer-led trade association that works with affiliated state associations to help protect and advance corn growers’ interests. The NCGA mission is to create and increase opportunities for corn farmers and our vision is to sustainably feed and fuel a growing world.

On behalf of my family and the nearly 40,000 dues-paying corn farmers nationwide and more than 300,000 corn growers who contribute to corn promotion programs in their states, I appear before you today in opposition to the petitions on 2,4-D.

Farmers and Consumers Rely Upon 2,4-D

Each year, our members vote on policy to direct the work of our organization. Just last month, they reaffirmed our commitment to reducing trade barriers that hurt farmers – for both imports and exports – and ensuring access to products we need to raise a corn crop year in and year out.

Two years ago, NCGA appeared before the Commission in the Urea Ammonium Nitrate Investigation. We are appreciative that the Commission made unanimous negative determinations in that case. We see a lot of similarities between the UAN

case and this case. Both cases were brought by a single, dominant domestic supplier seeking to further consolidate its market position. Imports were not injurious in the UAN case, and we do not believe that they are injurious here.

Like the UAN case, this case is incredibly important for American farmers. Herbicides are one of our most significant inputs into farming crops, and 2,4-D based products are widely used herbicides in this country for corn and soybeans. Disruptions to the herbicide market will have a direct impact on our nation's farmers and the consumers that rely upon our crops for their food and fuel.

This is a product that is also important for conservation and climate-smart agricultural practices, because it provides an option to control weeds without using tillage. Without herbicides to control weeds, tillage is the only viable option to raise a crop. This would set back decades of progress farmers have made improving soil health and decreasing soil erosion.

2,4-D is also used more broadly in this country beyond its use for crop production. Because it is one of the oldest and most proven chemistries to kill broad leaf weeds in a variety of crops and grasses outside of corn, it is also used by everyday Americans on their lawn or in their garden. This case could cause ripple effects across the entire country, and impact millions upon millions of Americans.

We are deeply concerned about anti-competitive behavior and shortages in this market if this case moves forward. Given the seasonality of farming and our short windows of opportunity to spray and plant, it is important for us to have a ready supply of product.

New Duties on 2,4-D Could Have a Devastating Impact on Farmers

In recent years we have seen the market price for these products and other inputs steadily increasing. Costs of production per bushel of corn is currently near record-highs. Meanwhile, the price received for corn has been decreasing. In the past two years, the price of corn has declined by more than 40%. This has put a squeeze on farmers.

As farmers, we closely consider the impact of our inputs to raising a crop each year. This scenario under consideration has the potential to limit imports of an important

product and create a supply shortage, in an already tight market. Farmers are price takers, not makers in selling our commodities, and managing our costs of production is crucial to our success. The issue at hand creates an even more difficult economic scenario for me, my family, and the farmers I represent.

We understand the need to use the right product, at the right rate, at the right time and in the right place. Those are the four pillars of conservation and nutrient management farmers employ across the U.S. We are thankful that companies like Corteva have invested in new technologies, including seed traits and herbicides, that allow us to continue producing more effectively and efficiently every year.

However, if new duties go into force on these imports, and most of the imported product is out of the market, it would put America's farmers in a very precarious position. Thousands of farmers simply cannot rely upon a sole domestic supplier of 2,4-D acid to meet nearly all of the market's 2,4-D needs. That will undoubtedly lead to shortages and delays in an industry that needs this product, and that must have timely delivery. That would be a horrible result for American farmers, and indeed for the American people who rely on our ability to produce a consistent and reliable product in an efficient manner.

Our members have provided feedback on experiencing supply shortages at the time of the COVID-19 pandemic, along with paying increased prices for 2,4-D in recent years. I too have experienced this on my farm. We don't want to feel an even sharper burden as we look to improve our competitiveness in climate-smart agriculture practices domestically and around the world.

My family, along with many other corn farmers around the country, need access to 2,4-D products so we can continue to produce a safe, robust, and affordable food supply for all Americans. For these reasons, we request that the Commission made negative determinations in this case.

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.

/s/ Harold Wolle
Harold Wolle

April 3, 2024
Date