

## Dicamba Update

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### Overview

As of March 2026, the landscape for over-the-top (OTT) dicamba use has shifted once again. Following the 2024 court-ordered vacancy of previous registrations, the EPA issued a new, time-limited federal registration on February 6, 2026.<sup>1</sup>

If you are a grower or applicator planning to use dicamba-tolerant (DT) soybeans or cotton this season, you are facing what the EPA calls the "strongest safeguards ever." Here is a comprehensive guide to what you must know for the 2026 spring and summer seasons.

### The Legal Standing: A "Time-Limited" Window

The new registrations for Stryax (formerly XtendiMax), Engenia, and Tavium are valid only for the 2026 and 2027 growing seasons.<sup>2</sup>

- **Current Status:** Federal registration is active, but you must verify state-level approval. Some states (like South Dakota and Minnesota) may have additional restrictive cutoff dates or specific temperature caps (e.g., 85°F).
- **Ongoing Litigation:** Within two weeks of the 2026 re-approval, environmental groups filed new lawsuits in the Ninth Circuit Court of Appeals.<sup>3</sup> While the products are legal to use *now*, the "social fabric" and "procedural" arguments that vacated the labels in 2020 and 2024 are being tested again.

### Drastic Rate Reductions

The total amount of dicamba you can apply in a season has been halved compared to the 2020 label.<sup>4</sup>

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<sup>1</sup> EPA Press Office, "EPA Implements Strongest Protections in Agency History for Over-the-Top Dicamba Use on Cotton and Soybeans for Next Two Growing Seasons" (February 6, 2026).

<sup>2</sup> These are the primary references. Also, it is important to note that this is a time-limited conditional registration. The EPA is using the two-year window as a test period to collect data on whether these new mitigations actually stop off-target movement.

<sup>3</sup> National Family Farm Coalition v. Environmental Protection Agency, *et al.*, No. 26-1021 (filed, 9th Cir. Feb. 20, 2026). The petitioners allege that the EPA's February 6, 2026, registration order violates both the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Endangered Species Act (ESA). The petition specifically seeks review of the EPA's order registering the three products (Stryax, Engenia, and Tavium) under Docket No. EPA-HQ-OPP-2024-0154. As of now, the registrations remain active and the products are legal for use for the 2026 season unless the court issues a stay or an emergency injunction. The petitioners' opening brief is due May 11, 2026, and the EPA's response brief is due June 10, 2026.

<sup>4</sup> The 2026 label adds a slightly stricter window for daily applications with spraying prohibited starting one hour after sunrise and ending two hours before sunset. The previous window was "between sunrise and sunset."



- **Single Application:** Max of 0.5 lb ae/acre.
- **Annual Limit:** Max of 1.0 lb ae/acre (total of two applications per year).<sup>5</sup>
- **Crop Stage Limits:**
  - **Soybeans:** Up through R1 (beginning bloom).
  - **Cotton:** Up to 7 days pre-harvest.

### New Temperature-Based Restrictions

The 2026 labels replace many fixed calendar cutoffs with dynamic temperature-based limits to address volatility:

- **The 95°F Hard Stop:** No applications are allowed if the forecasted high for the day (or the day after) is 95°F or higher.<sup>6</sup>
- **The 50% Rule (85°F–95°F):** If the forecast is between 85°F and 95°F, you can only treat up to 50% of your untreated DT acres in a county.<sup>7</sup> You must wait at least two days before treating the remaining 50%.
- **State Specifics:** Be aware that some states maintain an absolute cutoff of 85°F regardless of the federal 95°F limit.

### Enhanced Buffer Zones & Drift Mitigation

Drift remains the primary concern for the EPA. The 2026 requirements are non-negotiable legal mandates:

- **Downwind Buffer:** A mandatory 240-foot downwind buffer must be maintained. This distance can only be reduced if you use EPA-approved "additional mitigations" like hooded sprayers or specific windbreaks.
- **Wind Speeds:** Applications are only permitted when wind is between 3 and 10 mph.
- **Spray Height:** No more than 24 inches above the target (soil or crop canopy).
- **No Aerial Apps:** Aerial application remains strictly prohibited.

### The "Double-Up" Tank Mix Requirements

To suppress volatility and drift, every tank mix must now include:

1. **Volatility Reduction Agent (VRA):** The required rate has doubled to 40 oz/acre of an approved pH-buffering agent (e.g., VaporGrip Technology).<sup>8</sup>
2. **Drift Reduction Agent (DRA):** An approved DRA is still mandatory for every OTT application.
3. **No AMS:** Mixing with ammonium sulfate (AMS) is still strictly prohibited as it significantly increases volatility.

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<sup>5</sup> If the thermometer is forecast to hit 95°F at any point on the day of application or the following day, the trigger is pulled and spraying cannot occur. This prevents "late afternoon" applications that could volatilize the next morning. Also, in previous years, the limit was 2.0 lbs. ae/acre. Also, the 1.0 lb. limit is the total for all dicamba applications (pre-plant, pre-emergence and OTT combined).

<sup>6</sup> The "day after" clause is a critical detail for preventing volatility-related drift as the products sits on the leaf.

<sup>7</sup> The EPA requires that the 50 percent of untreated acres be calculated per county, per grower. For example, if a grower has 1,000 acres of DT soybeans in a county and 400 are already treated, the 50 percent applies to the remaining 600 acres. It is a "rolling" calculation that can become complex for large operations.

<sup>8</sup> Users must still consult the manufacturer's website within seven days of application to ensure their specific tank-mix partners and VRAs/DRAs are still approved. In addition, the 40 oz rate is generally required regardless of the spray volume. This is a per acre mandate to ensure a high enough pH buffer is present on every leaf.



**Endangered Species Act (ESA) "Point System"<sup>9</sup>**

For the first time, growers must implement a conservation point system to mitigate runoff and protect local ecosystems.<sup>10</sup>

- **The Requirement:** Most fields must achieve 3 points from a menu of approved practices (e.g., cover crops, grassed waterways, or contour farming).
- **PULAs:** In "Pesticide Use Limitation Areas" (determined by *Bulletins Live! Two*), you may be required to achieve 6 points.

**Note:** Growers can often earn 1 point simply by documenting their mitigation plan in their records, which helps bridge the gap to the 3-point minimum.

There is also a reinforced prohibition against applying to saturated soils to prevent runoff into waterways.<sup>11</sup>

**2026 Dicamba ESA mitigation menu:**

Points	Conservation Practice	Technical Notes
3 Points	No-Till	No soil disturbance from harvest of the previous crop to the current application.
3 Points	No Irrigation	Only allowed if you do not irrigate for the entire season.
2 Points	Cover Crops	Must be planted and established before the dicamba application.
2 Points	Reduced Tillage	At least 30% crop residue must remain on the surface after planting.
2 Points	Grassed Waterways	A permanent strip of vegetation designed to move water without erosion.
2 Points	Contour Farming	Planting/tillage follows the natural curves of the field's slope.
1 Point	Documentation	Automatic 1 Point for keeping detailed digital or paper records of all ESA mitigations. It is suggested to maintain a "written mitigation plan" before application. Simply keeping application records may not be enough for this specific point.
1 Point	Vegetative Buffer	A 30-foot (or larger) permanent vegetative strip along the field edge.

<sup>9</sup> This is a major "new" requirement for 2026.

<sup>10</sup> The "menu" of practices is contained in the EPA's Pesticide Registration Review documents.

<sup>11</sup> The saturated soil rule is separate from the 48-hour rainfall forecast rule which bars application if rain is expected. The saturated soil rule bars application if the ground is already wet enough to cause runoff.

**Farmer's Compliance Checklist**

Requirement	Action Needed
<b>Training</b>	Complete the 2026 mandatory annual dicamba stewardship training.
<b>Bulletins Live! Two</b>	Check for local ESA restrictions within 6 months of application.
<b>Record Keeping</b>	Complete records by the end of each day; keep for 2 years.
<b>Nozzles</b>	Use only "Coarse" to "Ultra Coarse" droplets as specified on the website.
<b>Rainfall</b>	Do not apply if rain is forecast within 48 hours.

**Conclusion**

The 2026 dicamba landscape represents a fundamental shift from simple calendar dates to a complex, data-driven compliance model. With the introduction of the ESA point system, dynamic temperature thresholds, and doubled VRA rates, the EPA has signaled that continued access to this technology is strictly contingent upon a grower's ability to document and execute high-level stewardship. While the current time-limited registrations provide a path forward for the 2026 and 2027 seasons, the pending litigation in the Ninth Circuit serves as a reminder that the legal window remains narrow. For producers, success this season will require more than just a clean field; it will require meticulous record-keeping, a proactive written mitigation plan, and a constant eye on both the forecast and the federal docket.

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