



July 27, 2018

Richard P. Keigwin
Director, Office of Pesticide Programs
US Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Mr. Keigwin,

On behalf of Beck's Hybrids, I would like to discuss the issue of dicamba drift and volatilization that is occurring on sensitive crops (including non-dicamba tolerant soybeans, high value trees, ornamentals, gardens, vegetable crops, vineyards and organic crops) in 2018. Beck's Hybrids is the fourth largest soybean seed seller in the United States marketing soybeans in eleven Midwestern states that have 60% of the soybean acreage in the US. Beck's is a family owned, Indiana-based company that began in 1937 and has grown dramatically over the last twenty years. We believe in giving farmers choices in soybean herbicide technologies and offer many choices for the industry so farmers can choose the best herbicide system to combat the weed challenges they face including Roundup® resistant weeds. In 2018, Beck's sold over one million bags (units) of soybeans containing Roundup Ready 2 Xtend® technology as well as significant volumes of other technologies such as LibertyLink®, Glyphosate Tolerant, Roundup Ready2Yield® and LibertyLinkGT27®. **We are asking that the dicamba label for XtendiMax®, Fexipan®, and Engenia® be modified to restrict dicamba in its current formulations to pre-plant only.**

The reason for this recommendation is five-fold. The first point is that the Roundup Ready 2 Xtend label was modified for the 2018 crop year to control off target movement, either from drift or volatilization, of dicamba applications on Roundup Ready 2 Xtend soybeans. Secondly, over 96,000 applicators were trained before the start of the 2018 crop year to fully understand the restrictions of the label. It is expected that more than two times (25 million to 50 million acres) the amount of Roundup Ready 2 Xtend crops, soybean and cotton, were planted in 2018 verses 2017. Monsanto reported that 61% of growers in 2018 were planning on using a dicamba herbicide on their Roundup Ready 2 Xtend soybean fields. The remaining percentage of growers are planting Roundup Ready 2 Xtend for reasons other than weed control benefits presumably for performance or protection from dicamba drift/volatilization. Third, there is still a significant amount of dicamba drift/volatilization reports in 2018 as there was in 2017 that precipitated the label change and training. Fourth, with farmers' concern of drifting of dicamba on other non-dicamba soybean technologies, this may limit these technologies' abilities to make an impact on weed resistance. There are newer technologies (Enlist® and MGI) that haven't received full export approvals that may never have a chance to make an impact on weed resistance because they don't contain dicamba tolerance.



Finally, we believe that it is important for the agricultural community to be good stewards of our technology and resources. We are concerned that the non-ag public will see these off target movements as a sign we are not being good stewards. We believe it is better to have good regulations to protect technology proactively than to have bad regulation enforced after the fact.

Beck's SUPPORTS the use of Roundup 2 Xtend technology to help combat resistant weeds, however we urge the EPA to modify the current dicamba label on Roundup Ready 2 Xtend crops to disallow in season usage and focus on usage as a pre-plant option only. This allows all other soybean herbicide system technologies to be available to help combat weed resistance and solves the majority of the off target movement which will reduce the complaint calls from specialty growers and homeowners.

Sincerely,

L. Sonny Beck
Chief Executive Officer
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