



Submitted Electronically

November 4, 2019

Dear Indiana Pesticide Review Board:

Agribusiness Council of Indiana (ACI) was formed by a combination of mergers of agribusiness associations that handle grain, feed, seed, plant food and agricultural chemicals for farmers in order to better represent this important industry in the 21st Century. ACI has nearly 130 member companies based in every county of the state, employing Hoosiers throughout rural Indiana, and creating a significant economic impact. We are the proactive voice of businesses serving Indiana agriculture. ACI members have a strong commitment to protect the public and the environment.

In accordance with feedback from its membership, ACI supports the federal label regarding the use of Engenia, FeXapan, and XtendiMax formulations. Specifically, we support maintaining the application of these formulas within 45 days of planting.

Given the history of soybean planting in Indiana, the application within 45 days of planting would allow dicamba to be completed by the end of June. This also allows the market for double crop soybeans in southern Indiana to utilize the dicamba tolerant system. Indiana farmers must maintain some flexibility in how they use this technology and other technologies in the future.

We respectfully request that you not give a favorable recommendation for the Office of the Indiana State Chemist's (OISC) pursuit of a FIFRA Sec. 24C/Special Local Need labels for the 2020 registration year for the following products:



- Engenia Herbicide (EPA Reg. No. 7969-345);
- DuPont Fexapan Herbicide Plus VaporGrip Technology (EPA Reg. No. 352-913);
- Tavium Plus VaporGrip Technology Herbicide (EPA Reg. No. 100-1623); and
- Xtendimax With VaporGrip Technology (EPA Reg. No. 524-617).

ACI members are committed to training and product stewardship to minimize the environmental impact and maximize the performance of this technology.

Thank you for your consideration!

Respectfully,

Amy Cornell
ACI President