

November 5, 2019

Dear Indiana Pesticide Review Board Members:

As an agricultural cooperative serving farmers in Indiana and throughout North America, GROWMARK 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. It is imperative that Indiana producers maintain some flexibility in how they use this technology and other technologies in the future.

## **BACKGROUND**

For many years, weed control methods included mechanical, chemical, and cultural control practices to manage the growing number of resistant weeds. During that time, we anxiously waited for the new herbicide traits and the registered products to help manage or mitigate the spread of glyphosate-resistant weeds. Like prior herbicide trait approvals, the anticipation for the dicamba-tolerant system was high and was followed by the excitement of how it would work in a weed management system for our grower customers. Our first experience in 2017 presented a few challenges due to the new system, but we felt we effectively managed the system given the complexities around the product label and required best management practices (BMPs).

For the third straight year, GROWMARK and its member cooperatives took a very methodical and aggressive approach around the product and application stewardship of the three labeled products: Engenia, FeXapan, and XtendiMax formulations. We continue to use the products according to guidelines and direction of the U.S. Environmental Protection Agency (US EPA).

For 2019, our grower-customers planted dicamba trait soybeans on over 70% of their soybean acres. At the same time, planted acres of Liberty Link increased for the third straight year. Collectively, our System experienced significantly fewer dicamba concerns than the previous two years. Also, it's important to recognize that the past three years have been very challenging for Indiana farmers due to wet springs and delayed applications.

Like the growing seasons outlined above, the registered products had significant changes, too. The newly required BMPs and classification of each of the three products as a Restricted Use Product (RUP) had us operating under a microscope around the technology. Over the winter months, we enhanced our training and spent a significant amount of time in the field and

classroom with our crop specialists and custom applicators. Key areas of preparation focused around the guidelines provided by the US EPA and the product registrants around tank contamination, inversions, buffer and border management, volatility, and the use of drift reduction agents (DRA). We continued to increase our training platforms over the last three years. This is an example of our System's commitment to product stewardship to maintain the tools needed to manage the growing number of resistant weeds.

Growers are seeing the benefits of the technology with cleaner fields. Our concern is that additional restrictions will reduce the effectiveness and adoption of the technology. In discussions with our members, the comments and concerns about losing the technology was evident. Yes, we must take the legitimate concerns seriously, but some of the proposals identified to address those concerns will not work to keep pace with current farming practices.

## **SUMMARY**

GROWMARK supports the federal label as it stands today in that an application of dicamba must be made within 45 days of planting. We respectfully request that you not give a favorable recommendation for the OISC's pursuit of a FIFRA Sec. 24C/Special Local Need label 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)
- Xtendimax With VaporGrip Technology (EPA Reg. No. 524-617)

We need to make sure that Indiana producers maintain some flexibility in how they use this technology and other technologies in the future. We will continue to focus on the training and product stewardship that minimized the environmental impact and maximized the performance. That will include applications made when environmental conditions are optimal, such as temperature and humidity levels. As registrants and university researchers continue their evaluation of dicamba, they can communicate the risks and precautions they discover.

Thank you for the opportunity to share our perspective.

Sincerely,

Dr. Jeff Bunting  
Crop Protection Division Manager  
GROWMARK, Inc.

*GROWMARK is an agricultural cooperative with annual sales of \$8.5 billion (FY 2018 data) providing agronomy, energy, facility planning, and logistics products and services, as well as grain marketing and risk management services throughout North America. GROWMARK owns the FS trademark, which is used by affiliated member cooperatives. More information is available at [www.growmark.com](http://www.growmark.com).*