

**July 13, 2017**

**Dicamba: EPA Meeting with State Representatives**

**Background:** Since June 2017, the EPA has been receiving reports regarding a high number of crop damage incidents involving the active ingredient dicamba. The number of complaints is especially high in Arkansas, Missouri, Mississippi, and Tennessee. Recently, a number of other states are reporting complaints including more northern states.

Dicamba was registered by the Agency for use on dicamba tolerant cotton and soybeans late in 2016 (Monsanto's DGA in November and BASFs BAPMA in December). EPA would appreciate the opportunity to discuss these damage incidents with representatives from the States.

**Participating States & EPA Regions:** R4, R5, R6, R7, CO, VT, SD, TX, KS, OK, VA, MI, WV, DE, NC, SC, AL, FL, WI, OH, IL, IA, MO, TN, AR, GA, MN, ND, NB, MS (*list may be incomplete*). State participants included regulators, applicator trainers, educators, and weed scientists.

**State Input on Dicamba Incidences** (State representatives) - *EPA would like to solicit feedback from state experts concerning experiences from within their state reflecting damages observed from use of dicamba in the 2017 growing season. Items of particular interest to the Agency are:*

- A. What is the scope of damage witnessed so far?
- B. What is/are the source(s) of the damage?
- C. What kind of training was conducted in your state?
- D. Are there measures that can be identified that, if employed, would likely have helped avoid damage?
- E. What can the state's share regarding their on-going investigations?

**Partial State Comments Included:**

1. Reports on complaint & investigation numbers to date.
2. Actual incidents may be 5X the number of complaints filed with state authorities.
3. Non-DT beans seem more impacted than non-DT cotton; scope of other impacted vegetation incomplete at this time.
4. Many states & companies did unprecedented training & outreach than for any product rollout.
5. MO, AR, TN all passed emergency rules to implement additional use restrictions or prohibitions.
6. Many incidents involve some of the more state-trusted applicators & farmers that swear they were following label directions explicitly; label violation vs. compliance will be challenging.
7. Most states don't access & record yield & acreage impacts.
8. State investigations are going to take a long time to finalize, based on number & difficulty in accessing compliance with all potential application variables & sources.
9. Some states point to advance training minimizing their complaint numbers, but different sensitive cropping patterns in those states may play a role.
10. Concern about whether non-state investigated incidents will make it into 6(a)(2) incident data.
11. States are already being asked by impacted growers whether they need to switch to DT crops next year as a defensive measure, even if they don't intend to use dicamba. Seed and chemical purchase decisions for next season are just around the corner.
12. Everyone is interested in potential yield impacts.
13. Risk/benefit decisions will be tough to make if we don't have reliable 2017 figures on acres of DT crops planted & dicamba use totals & locations.
14. Those on the front line are currently skeptical of almost everything at this point.

**Closing Remarks/Discuss Possibility of Additional Meetings (OPP)**