

July 5, 2017

Dave Scott
Secretary
Indiana Pesticide Review Board

RE: Proposed Rule #17-180, Restricted Use Pesticides

On behalf of the members of Indiana Farm Bureau, I am pleased to submit these comments in support of the proposed rule to list certain herbicides containing dicamba as restricted use pesticides. This proposal is an appropriate and responsible step to address concerns created through the incorrect use of herbicides containing the active ingredient dicamba, which may move to off-target areas and harm non-tolerant crops.

The development of dicamba tolerant crops is an important step in the ongoing struggle to address herbicide resistance in weeds. Our members know that access to a diverse portfolio of herbicides is critical to weed management and provides the flexibility needed to maintain conservation tillage systems and economically viable crop production. It is with this in mind that we support the proposed rule.

It is clear, based upon a review of the proposed rule language and products available on the market, that this rule is targeted to those situations in which dicamba would be used in an agricultural setting on farm fields. The vast majority of farmers are already licensed by the Office of the Indiana State Chemist so they can apply restricted use pesticides. Adding dicamba containing products to the RUP list will not have a negative impact on farmers. To the contrary, we believe this is a positive step in that it will help ensure that dicamba can remain a vital product for use in post-emergence settings.

Additionally, our experience has been that steps like the one proposed are generally accompanied by a focused education effort provided by OISC and Purdue University to educate farmers about the appropriate use of the pesticide. In this case, we believe that continuing education on the proper use of dicamba as one of the programs used to meet educational requirements for licensed farmers will provide additional benefit for the proper use of the product and better weed management overall.

Unfortunately, incidences in other states have forced Indiana to take this step to ensure that dicamba is appropriately applied. We believe that this proposal will allow the OISC to respond to and resolve complaints. We understand that alternatives such as imposition of much higher fines for improper use or outright bans on certain products are a possibility if this effort fails. We believe that making dicamba a restricted use pesticide will address the issue. However, if challenges persist, we commit to working with the OISC and the Pesticide Review Board to address the issue.

Questions regarding these comments may be directed to the undersigned.

Respectfully submitted,



Justin T. Schneider
Director, State Government Relations