

March 17, 2021

Members of the Arkansas Plant Board:

On March 3, 2021 Tyler Hydrick, a Certified Crop Consultant and an Arkansas Licensed Crop Consultant, provided an in-depth presentation on the lessons learned since over-the-top (OTT) dicamba formulations were first approved and the growing weed control challenges facing Arkansas growers. Mr. Hydrick's petition for rulemaking, presented on behalf of a group of Arkansas farmers, requested that the Arkansas State Plant Board adopt the federal label for the OTT dicamba herbicides, which include Engenia® herbicide. BASF emphatically supports this request and welcomes the Plant Board's March 3rd decision to initiate rulemaking that could allow Arkansas farmers and applicators to follow the federal Engenia Herbicide label.

BASF has worked with the EPA to provide information and data that supports the Engenia herbicide registration (EPA Reg. No. 7969-472) issued in October 2020. We feel strongly that the resulting label enhancements have simplified and streamlined the label for OTT use on soybeans and cotton and further reduce the risk of harm from off-site movement. The key label changes are:

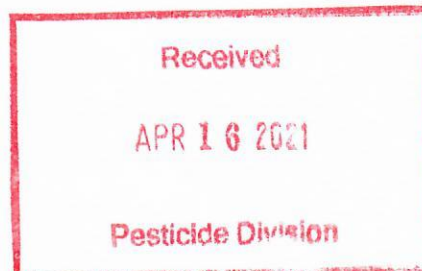
- Engenia herbicide can only be used for pre-plant, pre-emergence and post-emergence applications on dicamba-tolerant soybeans and cotton. Conventional crop and non-crop uses have been removed from the new registration.
- The federal label has replaced growth-stage application time limits with use cut-off dates. These new, national cut-off dates are June 30 for soybeans and July 30 for cotton.
- Soybeans and cotton are limited to two OTT applications per season. Engenia herbicide can also be used pre-emergence, but the annual cumulative use rate limit of 51.2 fl oz/A remains.
- The use of a qualified pH buffering adjuvant, like Sentris™ buffering technology, is now mandatory for all dicamba applications on DT crops. These approved pH buffering adjuvants increase the spray mixture pH, further reducing the potential for off-target applications.
- Down-wind field buffers have been increased from 110 feet to 240 feet outside of identified Endangered Species Areas.
- In Endangered Species Areas identified on the Bulletins Live! Two Website, the down-wind buffer increases to 310 feet (from 110 feet under the previous label). The same omni-directional buffer of 57 feet still applies.

We believe that this technology is critical in the battle against resistant pigweed and would encourage the Arkansas State Plant Board to adopt a regulation consistent with the federal label. This would put farmers in Arkansas on the same playing field as their peers in neighboring states and not at a competitive disadvantage.

Sincerely,



Scott Kay
Vice President, US Crop
BASF North America



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