

To: The Members of the Arkansas State Plant Board  
RE: Dicamba regulation changes  
By: Danny Townsend

*Dropped  
off Thursday  
4-22-21  
per Scott Brown*

**Received**  
**APR 23 2021**  
**Pesticide Division**

The mission of the Plant Industries Division is to protect and serve the citizens of Arkansas and the agricultural and business communities by providing information and unbiased enforcement of laws and regulations thus ensuring quality products and services. Our vision is to maintain a competent, friendly, cooperative, and efficient Division able to promptly serve the agricultural and business communities and the general public in a credible, professional manner.

The Circular 6 also states the following:

#### **X. STATEMENT OF PURPOSE**

**Pesticides are valuable to Arkansas' agricultural production and the protection of man and his possessions from insects, rodents, weeds, plant diseases, and other pests. It is essential to the public health and welfare that pesticides be used properly to prevent adverse effects on man and the environment.**

This is your mission. At this time, it has been proposed that the Board again loosen restrictions on the use of Dicamba. This proposal comes with no scientific evidence to back it up. It is merely an appeal to give greater freedom to farmers in the use of a known volatile product.

As an original member of the Governor's Dicamba Task Force, I have seen no evidence from the beginning to support the loosening of restrictions on this herbicide, yet we continue to do so. We originally, decided to restrict the usage and not allow treatments after May 15<sup>th</sup> and review the evidence as it was presented. The evidence has clearly shown that the restrictions should not have been lifted. Many researchers including our own Jason Norsworthy have presented evidence against the continued over-the-top use of this herbicide. All the evidence has been ignored. I cannot understand how a regulatory body can ignore evidence and rule in favor of opinion.

The latest loosening of restrictions used EPA re-authorization as evidence of safety. It has been stated by the EPA itself that the organization was unduly influenced by politics in this decision. The evidence clearly shows that the product is volatile and harms non-target organisms. The Board's enforcement arm and inspectors have been consistently overwhelmed by the off-target damage complaints. This should be evidence enough to warrant further restriction not loosening of regulation. It should not influence the opinion of the Board where these complaints arise from. It should only be noted that they are valid and proven in fact to be true off-target damages.

Terry Walker (the previous Board director) called an emergency halt to the use of the product due to complaints. This was the right decision. The Governor's Dicamba task force (which some of you were members of) agreed with the stoppage. This was the right decision. The continued loosening of restrictions and deregulation without any scientific backing is not the right decision. Arkansans should not have to buy products to protect themselves from others trespass or live with the damages caused by other individuals to their private property. It is the job of your Board to protect them from this type of

violation of the law. It is the job of a manufacturer to produce a viable product. They have not done so, and it is the Board's responsibility to restrict any products which might harm man or the environment. I hope you will do so and deny this petition.

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