

June 8, 2018

Dear Stakeholder,

The use of safe and effective crop protection products play a significant role in the sustainability of Minnesota's agricultural economy. In recent years, Minnesota farmers have been forced to combat invasive species, like herbicide-resistant weeds and pyrethroid-resistant soybean aphids. This scourge of hard-to-control pests has been met by utilizing new biotechnology methods and older, existing pesticide chemistry. When we look back and think of "knee high by the Fourth of July", that saying became obsolete due to the advent of herbicides and advanced plant breeding that allowed our farmers to plant earlier and get away from intensive cultivation. In short, crop protection products and technology have changed the way that we farm, and that change has usually been for the better.

The prevalence of dicamba related damage in 2017 was like nothing we have ever seen before. The Minnesota Department of Agriculture (MDA) received hundreds of complaints, across hundreds of thousands of acres, about off target dicamba damage to non-dicamba-tolerant soybeans. After talking with growers across the state, conversations with University of Minnesota Extension faculty, and counsel from the Minnesota Soybean Growers Association's Drift Reduction Taskforce, the MDA imposed the following restrictions for the use of the three new dicamba products XtendiMax, Engenia, and FeXapan in dicamba-tolerant soybeans for the 2018 crop year through a Section 24(c) Special Local Needs label for each product:

- **Cutoff date:** Do not apply after June 20, 2018.
- **Cutoff temperature:** Do not apply if the air temperature of the field at the time of application is over 85 degrees Fahrenheit or if the National Weather Service's forecasted high temperature for the nearest available location for the day exceeds 85 degrees Fahrenheit. Local National Weather Service forecasts are available at <https://www.weather.gov/phi/localclimate>.

The spring of 2018 was challenging for many of our farmers with snow in April and extended periods of wet soils. Soybean planting progress was delayed early, but warm and dry weather, since late May, has largely put us back on track for a normal crop year with 93% soybeans and 98% corn planted by June 3rd. Most of the state had adequate moisture in top soil during the last week of May. The MDA is going to keep the above restrictions in place for the 2018 growing season for the following reasons:

1. Dicamba is most effective on small broadleaf weeds (less than 4 inches). Late applications only mean bigger weeds and greater likelihood of weed escapes.
2. Applying dicamba to small soybean plants also limits the height of the spray boom. Increasing boom height from 18 inches to 36 inches increases the potential for drift by 350% at 90 feet downwind from the sprayer.
3. In 2017, 75% of our dicamba damage complaints in Minnesota were associated with dicamba applications after June 21.
4. Other chloroacetamide herbicides such as Dual II Magnum, Outlook, and Warrant are available for use if weeds become problem after June 20.
5. Dicamba is an important tool in combating herbicide resistant weeds. The continued registration of these products is dependent on growers being able to use it with minimal impacts on their neighbors' homes, farms, and gardens.

In 2018, the MDA will actively monitor the use of dicamba in dicamba tolerant crops. Having a growing season of successful dicamba use under our belts will allow us to make informed decisions regarding the future registration status of these products. I hope that all of Minnesota's growers have a safe and prosperous year.

Sincerely,

A handwritten signature in blue ink that reads "David J. Frederickson". The signature is fluid and cursive, with the first name being particularly prominent.

David J. Frederickson
Commissioner