



June 19, 2018

Minnesota Department of Agriculture
625 Robert St N.
St Paul, MN 55155

Dear Commissioner Frederickson,

On behalf of the Minnesota Soybean Growers Association (MSGA), we are requesting a 7-day extension (June 27) of the cutoff date to Minnesota's label regarding the use of dicamba herbicide on dicamba-tolerant soybeans.

After 2017's difficult launch of this product, our organization fully supported the Department of Agriculture's 24C dicamba for dicamba-tolerant soybeans. Our farmer-led Drift Task Force recommendations were based on the scientific evidence that was known at the time, and also took into account historic planting dates, soybean maturity rates and herbicide application systems.

All of this technological information was processed and reviewed by our Drift Task Force, which is comprised of a diverse group of farmers from across the state. As we entered the 2018 cropping year, it was evident this would not be a typical growing season. Planting was delayed in many areas throughout Minnesota due to historic cold temperatures and snowfall in April. Since that time, our farmers have been continuously challenged by excessive rainfall and heat throughout late May and June.

All of these factors culminate in the Drift Task Force reconsidering the application cutoff date determined by MDA, and ultimately the label MDA provided to Minnesota farmers. While it's still our belief that Minnesota's label should remain more restrictive than the federal label, we must recognize the extraordinary weather circumstances leading MSGA to issue this request.

According to the DNR's latest report, from May 29 through June 18, the state of Minnesota averaged 4.56 inches of rain, 1.64 inches higher than the 10-year average. Some areas in the central part of the state have averaged more than 5 inches of rain during this period. Excessive rainfall makes it nearly impossible for proper applications of pesticides. The 7-day weather forecast for parts of Minnesota should allow for the safe application of these dicamba products.

While the weather was detrimental to pesticide application, it's created the ideal environment for weed-emergence. In some areas, it completely halted herbicide application, while creating perfect conditions for newly-developed resistant weeds and allowing resistant weeds to germinate and grow. These type of weeds are known to decimate yield opportunities in soybeans and are most aptly controlled by dicamba.

Soybean farmers are under more pressure than ever before. Farm income is down 50 percent in just the last five years; additionally, the possibility of major market tariffs have made 2018 more turbulent than ever. Tensions often run high when commodity prices are low, and decisions like this are critical and not taken lightly. We thank you and MDA for understanding that, in the end, we're all here for the same reason: to serve the farmers and rural communities of Minnesota.

Sincerely,

Michael Petefish,
President, MSGA