



Comments to Arkansas Plant Board

Proposed Dicamba Rule

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The Save Our Crops Coalition is a national grassroots organization comprised of growers, processors, commodity organizations and other interested parties with the mission of protecting sensitive crops from damages from the use of dicamba. We were pleased to offer in-person testimony on two separate occasions in 2014 to this Board as you contemplated additional restrictions to the use and applications of dicamba in the State of Arkansas. To your credit, Arkansas has led the entire nation in researching, recognizing, understanding and reacting to the threat that this particular compound brings to all of agriculture. Other states took the credibility that you established in this discussion and instituted their own protections, but there is no questioning that the genesis of recognizing the problem began in Arkansas. For your pioneering approach you are to be commended. This has not been an easy journey for your Board and the State and you have been the target of intense resistance to your efforts but you have remained committed to protecting the citizens of your state, your primary responsibility in public service.

The SOCC wishes to comment on the proposed dicamba ruling both in its scientific acceptance of the known facts about the problems of dicamba, but also on the continued effects your decisions will have on the entire agricultural industry.

Your previous cut-off date of April 16th contained great wisdom and led to a drastic reduction in off-target incidences. If they had truly been followed, the problems would have been nearly eliminated but experiences have taught us that the powers promoting the expanded use of dicamba would not be satisfied and continued use would occur even if used illegally. Because of that illegal use and the very nature of the product itself, damages still did occur even though at a reduced rate. As an attempt to compromise with those desiring expanded use patterns, your new proposal of May 21st will subject many acres of sensitive crops, pollinator habitats and rural landscapes to continued injury as dicamba will continue to move where it was not applied and cause damage. To mitigate this still likely cause of damage, your proposal to require a one mile buffer is a definite step towards safety of sensitive crops. There still remains two larger questions; 1.) Will applicators actually adhere to such a buffer requirement and 2.) How will atmospheric loading of dicamba where large acreages will be applied affect rural communities and pollinator habitats? And finally, the proposal to not allow glyphosate tank mixes also seems reasonable given the vast amount of data that suggests major changes in volatility are affected by such tank mixes.

Your influence on other states will remain strong. You embolden other states to take the science that is clear and complete and confirm that all formulations of dicamba continue to exhibit volatile tendencies and cause havoc to sensitive plants in a wide area far beyond the borders of the actual application. SOCC

also commends Arkansas' commitment in joining FieldWatch and championing their new CropChek platform development.

In addition to the buffer requirement, SOCC recommends that you keep the April 16th cut-off date in place as a way of making meaningful and enforceable spray applications. There is no other simple and effective way to ensure that off-target movement does not harm sensitive crops and habitats than to be able to observe spray applications taking place during a time period where movement is likely.