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**From:** Beck, Nancy [Beck.Nancy@epa.gov]  
**Sent:** 10/1/2018 10:46:27 PM  
**To:** Steve Smith [ssmith@REDGOLD.com]; Bennett, Tate [Bennett.Tate@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]  
**CC:** Keigwin, Richard [Keigwin.Richard@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]; Baris, Reuben [Baris.Reuben@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]  
**Subject:** RE: Thank you

Steve,

Thank you for coming in to meet with us and for providing this follow-up information. We greatly appreciate your taking the time to engage with the Agency on this important matter.

The EPA values your input as it will help inform our regulatory decision on whether to continue to allow the over-the-top uses of dicamba products.

Many thanks,  
Nancy

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**From:** Steve Smith [mailto:ssmith@REDGOLD.com]  
**Sent:** Sunday, September 30, 2018 3:41 PM  
**To:** Beck, Nancy <Beck.Nancy@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>  
**Cc:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Baris, Reuben <Baris.Reuben@epa.gov>  
**Subject:** Thank you

Ms. Beck, Ms. Bennett, Mr. Baptist and Mr. Bolen,

First I want to thank you for your commitment of time to meet with me on Friday. The chance to tell the story of what I see is a real threat to all of agriculture, not just specialty crops, was really appreciated. I had mentioned my Congressional testimony from 2010 so I have attached that to this note. In it you'll see some bolded statements concerning the risk to specialty crops, that the widespread use of dicamba is incompatible with Midwestern agriculture and that the increased usage of dicamba is poor public policy. It is my hope that you can see that these statements are not only true, but unfortunately a reality that has harmed all segments. The public will become more aware of what is happening and all of agriculture will suffer a "black-eye" when everyone figures out the source of the damages to sensitive landscapes and trees in addition to non-tolerant crops.

One of the items you questioned me about was the coordination of concerns among many different stakeholder groups. Specifically, United Fresh was mentioned and I casually made the comment that several years ago I did approach them about the issue but they had never really taken hold of the concern. One reason for this is that much of their major production takes place in regions where dicamba will not be extensively used and the other reason is that much of the fresh produce they deal with is imported and not even raised in the US. Their limited membership that would be affected has just not been vocal enough to spur them into the advocacy role this product really does demand

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for specialty crops. And also, as indicated, from a political standpoint, most anything that the processing industry would deem beneficial, United Fresh is in general opposition. That is disappointing to me but is in fact the reality and I wanted to explain that situation a little further.

Other segments of Midwestern agriculture are beginning to take serious note of the threat of dicamba use. Recently Beck's Seeds (the largest independent seed producer) and Stine Seed authored a letter to EPA explaining their concerns about grower choices. But even deeper in their concerns has been the issue of seed germination problems from off-target dicamba movement. When dicamba hits soybean seed, the germination is greatly reduced so their entire seed crop is at risk and many acres will be unacceptable to be used as seed for 2019. AAPCO has expressed their concerns about what this issue is doing to the regulatory departments in all the affected states and Indiana specifically commented in a letter concurring with the AAPCO note. At a recent meeting of the Indiana Pesticide Review Board, the State Chemist described their department not as the investigative and regulatory agency they were designed to be but as the "Dicamba Response Team," a description that emphasizes how their department has been inundated and fully absorbed into the problems dicamba has caused. I made a brief mention that my own home was hit and I just received the damage estimate from a professional landscaper with damage in excess of \$9000.00. The odds of me getting any settlement is probably low as an individual, but this is an example of what will be happening to the general public and they will not stand for it in the long run.

***Any registration of dicamba that even remotely resembles the status quo will harm all of agriculture.*** As I suggested in our meeting, I recommend that ***no post-planting applications should be approved.*** It will not completely eliminate all potential damages but would go a long way to reduce problems by a major percentage.

Thank you again for your time, I do realize the amazing strain this technology has caused all regulatory agencies in the country and you are at the focal point of trying to do the right thing for the future. The clamoring voices of the manufacturers and special interest groups demanding reregistration should not drown out the voices of those who understand the risks involved. Those risks are both predictable and preventable.

Sincerely,

Steve Smith  
Chairman, Save Our Crops Coalition

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