

BASF/MON Regulatory Working Group Meeting Notes (2-5-15)

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Monsanto dicamba technical registration: The PRIA date for Monsanto's proposed dicamba technical herbicide registration is 3-6-15. EPA informed Monsanto within the last week that there were labeling differences between their proposed labeling and BASF's current approved Dicamba Technical herbicide. Monsanto will likely request that BASF update our labeling to more accurately represent the uses approved for dicamba, so the two labels are the same. BASF's labeling could use an update, so BASF is like to agree with Monsanto and submit an amended Dicamba Technical herbicide label.

Monsanto also has a M1691 (dicamba DGA, Clarity) MUP registration pending, claiming 100% repack of Clarity herbicide. Because the Clarity uses and the proposed M1691 MUP labeling are not the same, EPA is saying that the M1691 MUP registration cannot be based on a 100% repack of Clarity. Monsanto has asked that BASF consider submitting for a Clarity MUP product registration, which would enable Monsanto to complete the registration action for their M1691 MUP product. The proposed Clarity MUP product concept will be discussed with the BASF commercial team and a decision will be made on the path forward.

Monsanto meeting with EPA: Monsanto recently met with Dan Kenny and Susan Lewis to try and get more information about what EPA's concerns are for the DT system and how EPA expects to move forward. Clearly it is EPA's uncertainty about their endangered species risk assessment in light of the spray drift and volatility concerns coming from the states that has EPA reassessing their earlier conclusions. Monsanto is pushing for an August approval that would include their VaporGrip products. Because EPA has recently indicated that they might favor the more advanced VaporGrip and Engenia products over the older Clarity based products, EPA suggested that they might be able to make a registration decision sooner for VaporGrip than M1691, but EPA was uncertain about the procedure necessary to do that.

EPA confirmed that their primary concerns about the DT system are spray drift, volatility and potential effects on the progeny of plants exposed to dicamba. Monsanto is preparing a white paper to try and help EPA work through these issues and to give EPA a defensible position for making a positive registration decision.

2015 Field testing concerns: Monsanto raised a concern about the amount of third party (academia) field testing that will be done with Engenia in 2015. Monsanto is concerned about results that could negatively impact EPA's registration decision and how tightly BASF controls the release of data by the third parties. BASF Biology and Tech Service will be advised on Monsanto's concerns.