

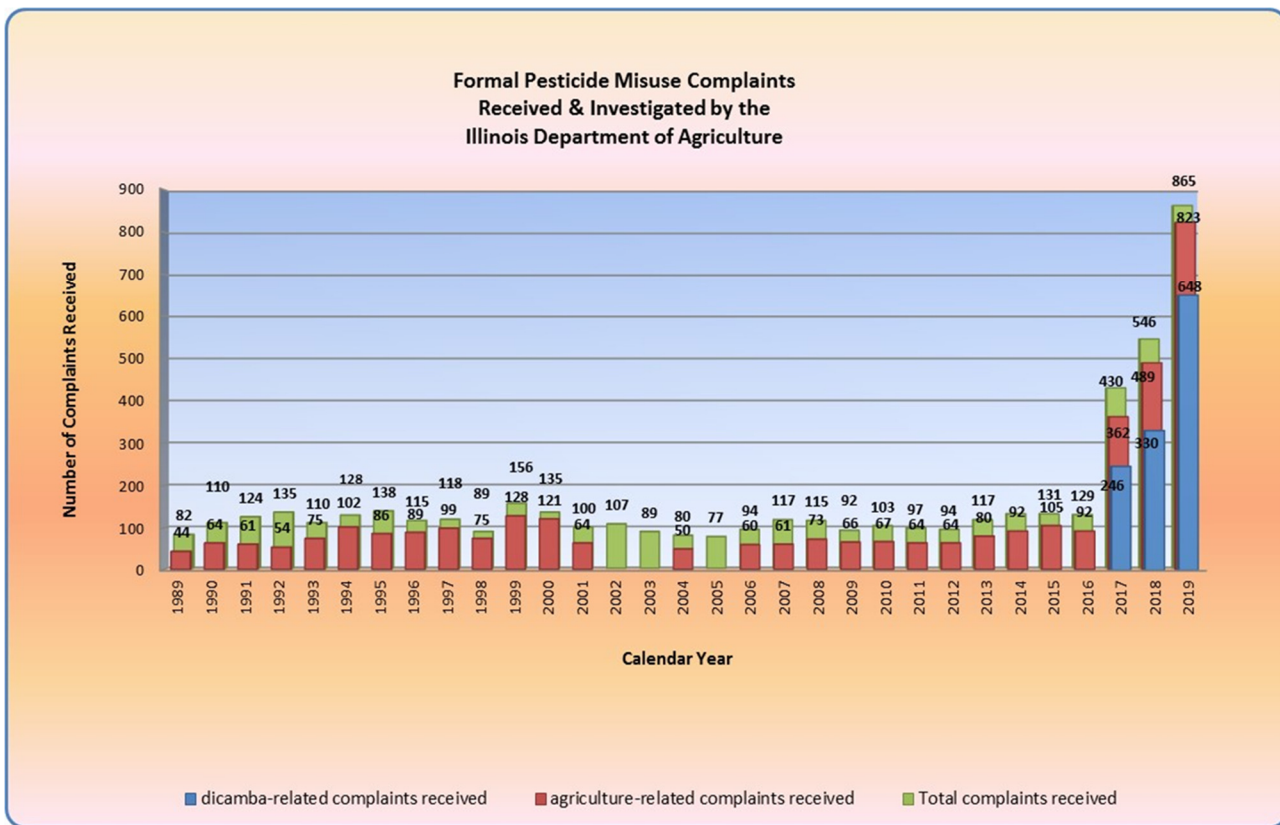
Dicamba and Pesticide Misuse Complaints: Can we be honest with ourselves, and others, to retain our credibility as an industry?

*By Jean Payne, IFCA President
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From 1989 to 2016, the average number of agriculture pesticide misuse complaints phoned in to the Illinois Dept of Ag and investigated by IDA have been a little less than 100 total complaints per year. This includes pesticides applied for burn-down, pre-plant, post-emerge and aerial application on 22 million acres of crops, with most crops receiving 1-4 applications per year.

This is, quite honestly, a remarkable achievement for our industry and something to be proud of! And even with this great track record, IFCA is always working with IDA and our members to bring down that number in our on-going effort to assure public trust in the judicious use of pesticides on millions of acres of grain crops.

Today, as the graph below shows, we have a serious situation given the dramatic increase in pesticide misuse complaints. I am going to let you look at this chart for a while (which is public record) then please read on.



I am passionate about advocating for the need and benefit of crop protection products and nutrients, and equally passionate about stewardship. Many times, I have been at the witness table at a regulatory or legislative hearing, extremely proud to represent all facets of our industry. I am still proud to do that, but if this table is blown up and displayed in a hearing room, where the general public is also present, what do I say about this graph? I would like to do what I always do with legislators, which is be honest and truthful.

The truth is that the trend in misuse complaints that began 2017 coincides with the use of dicamba on soybean. And as more acres are treated with dicamba, the number of complaints continues to rise. But it isn't all dicamba's fault. We have used dicamba for decades: on burn down, on pastures, on corn, on rights of way, on turf. From 1980 to 2016 the number of misuse complaints attributed to dicamba was about 5 or 6. Look at the chart again--do you see any blue bars on dicamba misuse until 2016? No. That bar didn't appear until 2017 and today it is over 600. Dicamba itself has proven to be a very safe and effective product. It's just that we never used it so late in the season before, and on so many acres, until the labels for use on soybean were approved in 2016 and continue to be approved.

IFCA supports this technology. IFCA also supports the strict parameters of the dicamba labels and the mandated education and training that goes along with it. No one can say we haven't especially when, last winter, nearly 4,000 of our very capable pesticide operators had to partake in additional training and testing to pass the field crop exam in order to become certified applicators in order to apply dicamba to soybean.

When this new label mandate was dumped on our heads in October 2018 with no warning, we instantly got to work to help ensure there would be enough training and certification opportunities for our thousands of pesticide operators. With MUCH effort from a lot of people, we pulled it off. I can't put into words the stress and strain I saw on the faces of our underappreciated pesticide operators as they put themselves through the training, studying and the anxiety of the test-taking in order to do what the industry expected of them. Many times, I wanted to cry. It was so unfair to them because there is nothing in the training that would suddenly make them better applicators of dicamba on soybean. Not to mention the cost of this regulatory requirement that the ag retailers had to bear.

Was all the effort, cost and mental anguish worth it? First let me say, education and training is always a good thing. But this training in particular was supposed to ensure that issues with dicamba would decrease, not increase. I will go on record here and say, the issues with dicamba in Illinois are NOT related to the abilities of our commercial pesticide applicators in Illinois. Since 1989, Illinois commercial applicators have managed new products and challenging weather and field conditions and have done so with less than 100 complaints a year where misuse was alleged. There is no way that these same people, who now have the highest level of training and certification that exists for pesticide application, are responsible for this dramatic increase in pesticide misuse complaints attributed to dicamba.

If Mr. Obvious were to show up at a hearing in the Illinois state legislature next year, and ask "what has changed to cause such an increase in pesticide misuse complaints?" This answer to that question, let's be honest, is this: the advent of the use of dicamba on soybean has resulted in this increase in complaints. It's a fact. IFCA has credibility with the legislature (hard earned) and we will tell the truth in order to retain our credibility (which we need for all kinds of other issues as well, like nutrient use, ammonia use and hours of service exemptions). And the vast majority of these increased complaints are coming from farmers (not tree huggers). That fact adds to the already serious nature of this issue. When farmers, who by their very nature are averse to the government coming out to their farm to inspect things, are subjecting themselves to that regulatory process because they do not like what they are seeing in their soybeans--this is a wakeup call! We can offer some solutions to the legislature, but will they be taken seriously if we can't first admit we have a problem?

IFCA is not giving up or ignoring this issue, thinking no one has noticed what is going on, and/or it will go away if we just don't talk about it. But people are talking and begging to be heard. I wish I had a dollar for every farmer who has called IFCA asking for our help because they know IFCA stands for stewardship. I assure them we are trying. I can also tell you it is not easy given the divide among our own members on this issue. But I always remember what my parents, my teachers and the IFCA board has taught me: Do the Right Thing. And so IFCA

will, and the right thing is unfortunately in this case not the easy thing. But again, first of all, we have to be honest and everyone in our industry needs to admit that we have a problem and work TOGETHER to solve it. There is indeed an elephant in the room.

Finally, I want to say this, echoing what many also believe. Farmers have the right to choose what they want to plant, where they want to plant, and what legal products they would like to use. In the dicamba training, all the registrants stressed this point: NOT EVERY FIELD IS A CANDIDATE FOR DICAMBA. They stated in the training and on many of their slides that if your field is not a good candidate or you are not comfortable with the responsibility of following this very strict label, DO NOT USE DICAMBA, use another program. I think a lot of farmers took that advice to heart and chose different seed and herbicide platforms. For them, they did what the training advised, and for them it was the right thing. We must listen to and support these growers and the choices they made because it was the right choice for them. Choice of platforms, and supporting those choices, remains the right thing for our industry. Dicamba symptoms, whether cosmetic or damaging, isn't something they should be forced to live with.

Going forward, IFCA will be transparent in our efforts with our members, our regulatory agencies, our legislature and the public. We will not dodge the hard questions. We will listen. We will be honest. We will offer proactive solutions to the problem. We will educate people regarding the judicious use of pesticides. We will support innovations and technologies that work and do not cause harm to others.

We will do the right thing.