

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
VIRTUAL MEETING SEEKING PUBLIC COMMENT ON DRAFT
EIS FOR DOWS 2,4-D-RESISTANT CROPS

Docket No. APHIS-2013-0044

Wednesday, January 29, 2014
Riverdale, MD

Reported by:
Christine Allen,
Capital Reporting Company

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1 A P P E A R A N C E S

2 MR. RICHARD GEORGE
Communications Branch Chief, USDA/APHIS/BRS;

3 DR. NEIL HOFFMAN
4 Scientific Advisor, USDA/APHIS/BRS

5 A G E N D A

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1 P R O C E E D I N G S

2 (5:00 p.m.)

3 MR. GEORGE: Good afternoon. My name is
4 Dick George. I'm the Communications Branch Chief
5 at Biotechnology Regulatory Services or BRS, part
6 of APHIS, the Animal and Plant Health Inspection
7 Service, an agency of the U.S. Department of
8 Agriculture.

9 Joining me is Dr. Neil Hoffman,
10 Scientific Advisor in the BRS Office of the Deputy
11 Administrator.

12 DR. HOFFMAN: We welcome you to this
13 virtual meeting being held to receive public
14 comments on corn and soybean genetically
15 engineered to be resistant to the herbicide 2, 4-D
16 and other herbicides.

17 We value your input and are pleased that
18 you joined us today, either to make a public
19 comment or listen to the comments of others.

20 MR. GEORGE: The purpose of this meeting
21 is to solicit your comments on a draft
22 environmental impact statement for petitions of

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1 non-regulated status for herbicide resistant,
2 genetically engineered plant. The draft EIS
3 focuses on one petition for corn and two petitions
4 for soybean that are resistant to the herbicide 2,
5 4-D as well as other herbicides.

6 For more information on these plants, go
7 to www.aphis.usda.gov/aphisvirtualmeeting. This
8 site contains background information and also
9 links to other documents and websites.

10 In the past, we've traveled around the
11 country to conduct meetings for interested parties
12 and make public comments in our various regulatory
13 actions. Today we're holding this online virtual
14 public meeting to allow more people the
15 opportunity to comment.

16 DR. HOFFMAN: We will be taking only
17 spoken comments today. If you prefer to make a
18 written comment instead of a spoken one, you can
19 do so by going to www.regulations.gov through
20 February 24th. Enter in the search docs the
21 docket number [aphis-2013-0042](https://www.aphis.usda.gov/aphis/areahandlers.do?docId=2013-0042). This will take you
22 to the pages where you can make your comment.

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1 The public comment period ends on
2 February 24th. You can go to regulations.gov any
3 time up until that date to leave a written public
4 comment or you can make a spoken comment here at
5 our meeting, which will go until 8:00 p.m. EST.
6 Whether spoken or written, your comment will
7 become part of the public record.

8 A transcript of your spoken comments
9 will be posted to the website in the next three
10 weeks.

11 Today we are here to receive your input
12 only, not to answer questions about the draft EIS.
13 For background information please go to
14 www.aphis.usda.gov/aphisvirtualmeeting.

15 MR. GEORGE: If you would like to make a
16 public comment today, on your telephone keypad
17 please press one and then zero. The operator will
18 then respond to you and let you know when it's
19 your turn to speak.

20 We ask that you keep your comments to
21 three minutes or less. We also ask that when it's
22 your turn to speak, to identify yourself and

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1 please say and spell your name so that our court
2 reporter has a good chance of spelling it
3 correctly in the transcript.

4 Written transcripts of this meeting will
5 be available within three weeks at that same
6 website address, [www.aphis.usda.gov/](http://www.aphis.usda.gov/aphisvirtualmeeting)
7 aphisvirtualmeeting.

8 DR. HOFFMAN: The statements received
9 during this public comment period, whether spoken
10 today or submitting in writing to regulations.gov,
11 will be considered in the development of the final
12 Environmental Impact Statement associated with
13 petitions for non-regulated status from Dow
14 AgroSciences LLC, for one corn and two soybean
15 events genetically engineered to be resistant to
16 various herbicides, including 2, 4-D.

17 After the final EIS is published, there
18 will be a decision on the regulatory status of the
19 petition. We welcome your comments today because
20 they will help us ensure that relevant issues are
21 considered as we prepare the final Environmental
22 Impact Statement.

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1 MR. GEORGE: If you'd like to make a
2 public comment today, on your telephone keypad,
3 please press one and then zero. The operator will
4 then respond and let you know when it's your turn
5 to speak.

6 With that, we're ready to hear from our
7 first commenter, and I see that we have three in
8 the queue to comment. So, the first comment, if
9 you would, please, say your name, spell your name,
10 and then go ahead with your comment.

11 MR. YOUNG: My name is Tommy Young. I
12 am a grain producer in Northeast Arkansas, located
13 in the small town of Tuckerman. I currently serve
14 in the Arkansas Corn and Grain Sorghum Promotion
15 Board as well as many other boards and farm
16 related associations.

17 I am a member of a family farm that
18 actively cares for over 6,700 acres of rye, corn,
19 wheat, and soybeans. I have been active on that
20 farm since I was in the third grade. I am 50-
21 years-old now.

22 My key responsibility since I was 14

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1 years old was to kill weeds. I have sprayed
2 chemicals all of my life, you could say, I have
3 watched palmeri amaranthus or palmer pig weed, as
4 the farmers call it, literally cause farmers to
5 lose total field of soybeans.

6 The story I like to tell is when I was
7 14, I liked to go to go to the lake during the
8 weekends and almost always a flush of pig weed
9 would make me miss the trip because my father made
10 me stay home and spray.

11 If these weeds were not sprayed on
12 Friday, by the time Monday rolled around, they
13 would be too big to kill using the herbicides that
14 I had back in the late '70s and early '80s.
15 Blazer was typically all I had.

16 Weeds had to be sprayed when they were
17 small to achieve an effective kill. Then the
18 miracle product came to the market, Round Up or
19 glyphosate was introduced along with Round Up
20 Ready Soybean. Timing back then was not as
21 critical. Round Up made bad farmers good ones. My
22 family was much into conservation. We produced

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1 over 2,000 acres of wheat every year. We began no
2 tilling on rebel crop soybeans into the wheat
3 straw and was spraying Round Up over the straw for
4 the initial burn down, and then following the
5 sequential spraying we could have a clean crop of
6 soybeans and never work the soil.

7 The straw held moisture in the soil and
8 also naturally helped prevent weeds and grass from
9 growing. We used rotation to further aid in our
10 wheat control scenario. We rotated every year
11 with corn, fall-winter wheat, then double crop
12 soybeans followed by corn. We were lucky in the
13 fact that weed resistance on our farm was held at
14 bay, I believe, because of the rotation practices
15 and the use of conventional chemicals on the
16 alternate crops, which aided in the non-resistance
17 of certain weeds.

18 However, resistance finally reared its
19 ugly head in the summer of 2009. We first noticed
20 it in our center pivot corners, which did not
21 receive the rotation like the irrigated portions
22 of that field had, the non-rotation and lack of

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1 good canopy caused the pig weed to find a home and
2 become resistant to glyphosate treatment. We saw
3 this resistance spread into the main parts of the
4 field in 2010 and by 2011 we knew our good years
5 of weed control with glyphosate was over. I can
6 tell you that palmeri amaranthus will literally
7 break some farmers. Everyone does not have the
8 rotational tillage practices to overcome this
9 powerful weed.

10 My family has incorporated an approach
11 of using residual herbicides as well as using old
12 conventional herbicides, some of which I used back
13 when I was 14 to combat this beast.

14 In short, if our nation's farmers are
15 expected to feed a growing world population,
16 especially with China's population expected to be
17 double by the year 2050, we must have new
18 technology. I have seen the Enlist program with
19 Colex-D technology. This product would be a
20 godsend to my area. This product would allow us
21 to control our resistant pigweed and other weeds
22 such as giant Mare's Tail. This product, which

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1 would cause farmers to plant 2, 4-D resistant
2 soybean, would open up a new door in my area
3 again.

4 I live in the heart of rye country; 2,
5 4-D is the best chemical bar none for controlling
6 stubborn weeds in rye. We cannot spray it due to
7 the fact it usually harms neighboring soybean
8 fields. The Enlist Program would eliminate this
9 problem. A farmer could literally spray both rye
10 and soybean fields side-by-side without fear.

11 In conclusion, farmers, contrary to
12 popular belief, are the best stewards of nature
13 and conservation we have on earth. The simple
14 fact is that economics dictate a lot of what we
15 can and cannot use on our crops. Farmers try to
16 use as little as possible for monetary reasons.
17 We also try to conserve our groundwater because we
18 need to to sustain our crops (inaudible) how much
19 we can spend on irrigation.

20 We also do not want to till the soil any
21 more than is absolutely necessary. All of the
22 above are in jeopardy in my area unless a new

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1 product such as Enlist is not introduced.

2 We will be forced to use more and more
3 conventional chemicals in larger quantities to
4 kill resistant weed. We'll be forced to go back
5 50 years in technology and start working the soil,
6 killing it and use these tactics to kill resistant
7 weeds. We will see our ground water and surface
8 water suffer because of these old tillage
9 practices and we will see farmers use more energy
10 to try and get all this done.

11 I am a farmer who is concerned with this
12 problem enough that it literally makes me wonder
13 if I should get out now.

14 Please fast track the process of
15 approving the Enlist Program and make it available
16 to us farmers as soon as possible. Thank you.

17 And once again, I am Tommy Young. I am a farmer
18 in Jackson County, Arkansas and I would appreciate
19 your consideration on this matter.

20 MR. GEORGE: Thank you very much for
21 that comment. We appreciate that.

22 We are ready to go to our next caller.

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1 OPERATOR: You have two questions
2 remaining.

3 MR. DAVIS: Hello, yes. My name is John
4 Davis. I'm from Central Ohio. I farm on a family
5 farm with my mother and father, my wife and my two
6 young sons.

7 First of all, I want to thank you all
8 for your efforts in regards to the quick response
9 on the draft Environmental Impact Study for the
10 Enlist technology. I also want to thank many of
11 you for the opportunity to meet you in Washington,
12 DC. I've been there three or four times and met
13 with many of you multiple times and some of your
14 colleagues. You have all made time to listen and,
15 I believe, truly understand our situation that we,
16 as producers, are facing in regards to the
17 herbicide resistant weed.

18 I do want you also to know that I listen
19 and can appreciate and understand the complexity
20 of the process in which you are working through.

21 The milestone of the DEIS is a great
22 one, however, I know we are just beginning and

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1 need to keep our foot on the throttle to get this
2 innovative technology approved.

3 I am really working hard here at home to
4 try and develop the best herbicide management plan
5 for 2014 spring planting and believe it's
6 important for you to understand that at this time
7 last year, I was anticipating the ability to use
8 this new technology. I am now a year later and
9 have made some adjustments in rotation and product
10 I will be trying to combat these weeds.

11 I think the most important point that I
12 want to express to you is I have not moved
13 backward yet toward more tillage and mechanical
14 methods. This would be a tragedy in my geography.
15 I have worked for 20-plus years using no till and
16 other conservation methods to help maintain good
17 soil structure and most of all water quality.
18 Please don't create a situation where many of us
19 in crop production would need to depend more on
20 tillage than technology. This would greatly
21 undermine many of the management and conservation
22 practices as well as programs that we have used to

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1 benefit the environment.

2 Time is coming near, in my area, where
3 drastic measures may have to occur to manage these
4 weeds. I do appreciate the rigorous review of
5 this new technology in a timely manner, but
6 frankly it is a first step in a long road ahead
7 and the rate needs to increase.

8 We need these tools in our toolbox to
9 reach our end goal as well as yours, a safe,
10 affordable food source for all that sustains my
11 land and farm for my sons and sustains U.S.

12 agriculture as the most efficient
13 producers in the world.

14 Let's keep the ball rolling on this new
15 technology and reach this goal together. We need
16 this technology for corn and soybeans in time to
17 plant for 2015. Once again, I'm John Davis from
18 Delaware, Ohio. Thank you.

19 MR. GEORGE: John, thanks so much for
20 your comment. And I see we have another caller in
21 the queue. Please go ahead with your comment.

22

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1 MR. NARE: Hi, I guess I'm up. This is
2 George Nare (phonetic). I'm a farmer in Iowa.
3 I've been a farmer 37 years, always corn and
4 soybeans. And I would like to say that I hope
5 that USDA does not pass the release of this new
6 Enlist technology.

7 The resistance we've got now in weeds is
8 a result of bad policy and the shortsighted
9 farming practices that have led to giant farms and
10 will lead, eventually, to farming without farmers.
11 I mean, if you make weed control so easy that all
12 you've got to do is call out the local elevator
13 and have them spray thousands of acres for you, it
14 isn't long before farmers will compete against
15 each other to the point where we really won't need
16 farmers anymore and corporations can do the
17 farming for us.

18 This summer I needed 2,4-D to kill
19 waterhemp in my corn because of the really wet
20 season I had for planting and I wasn't able to get
21 in and spray my normal post-emergence herbicide on
22 my corn, so the weeds got too big and I had to

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1 depend on a high clearance sprayer to spray 2,4-D.

2 Now, if you bring out this Enlist
3 technology, it won't be long before weeds become
4 resistant to 2,4-D and that means that option will
5 not be available. In other words, I will have new
6 weeds that I can't kill even if I didn't use
7 Enlist technology.

8 Another thing is, if my soybeans that I
9 plant aren't Enlist technology soybeans, then the
10 drift from my neighbors is going to be detrimental
11 to my soybeans. It'll either kill my soybeans or
12 cut my yields. And I have to ask the question, do
13 we really need more chemicals in the air for us to
14 inhale and endanger our health? I don't think so.

15 I think we'd better start looking at
16 long range solutions, putting the family farmer
17 first instead of just being able to raise more and
18 more cheap commodities for the big corporations
19 that are not interested in the family farmer's
20 livelihoods at all and will transport this
21 technology all over the world so that they can
22 raise corn and soybeans all over the world to keep

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1 the price of corn and soybeans cheap just as they
2 have done with Round Up Ready technology.

3 So, I would encourage USDA to take off
4 the blinders, get real, and start supporting
5 family farmers instead of the big chemical
6 companies. Thank you.

7 MR. GEORGE: Thanks very much for your
8 comment. We have another caller in the queue.
9 I'll reminder commenters to please say and spell
10 your name so that our court reporter has a chance
11 of spelling it correctly in the transcript. And
12 our next commenter, please go ahead.

13 OPERATOR: You have three questions
14 remaining.

15 MS. REED: Good afternoon, my name is
16 Genna, G-E-N-N-A, Reed, R-E-E-D, and I'm here
17 representing Food and Water Watch, which is a
18 nonprofit consumer advocacy group that supports
19 safe, accessible, and affordable food for
20 consumers and fair access to markets for farmers.

21 Food and Water Watch has commented on
22 the environmental assessment for Dow's Enlist 2,4-

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1 D corn and soybeans as well as the notice of
2 intent to prepare an Environmental Impact
3 Statement. At each of these junctures, we've
4 brought up numerous concerns about the impact of
5 2, 4-D intolerant crops and the increased use of
6 2,4-D on agriculture, the environment, and human
7 health.

8 We are incredibly disappointed to see
9 that the USDA has disregarded these concerns,
10 blaming much of their inability to assess the full
11 range of impacts of these crops on the scope of
12 their authority under the Planned Protection Act.

13 It's true that a plant-pest risk
14 assessment is simply inadequate to look at the
15 risks associated with these novel crops. Yet,
16 instead of finalizing PPA rules that would be
17 better suited to handle the risks of GE crops, the
18 USDA has approved variety after variety that will
19 create new risks in agriculture and the
20 marketplace and impose new costs on farmers and
21 the environment.

22 In the draft EIS, the USDA makes it

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1 sound as if the no-action alternative would be
2 worse than the status quo for agriculture. In the
3 executive summary, the USDA describes the
4 potential negative impacts of "more aggressive
5 tillage practices" that will have to be adopted to
6 manage glyphosate and other herbicide intolerant
7 weeds.

8 First, this could all be dealt with
9 through alternatives to chemical weed management,
10 like more diverse cropping systems, but also any
11 weed control benefits of the Enlist corn and
12 soybean crops will be negated because, just as
13 glyphosate resistant weeds have evolved in fields
14 treated with glyphosate year after year, 2,4-D
15 resistant weeds will arise in the same manner.

16 Like the EIS states, "The eventual
17 occurrence of weeds resistant to glyphosate, 2,4-
18 D, and glufosinate will, over time, limit the use
19 of Enlist crops and any benefit to natural
20 resources that may arise." The USDA goes on to
21 say that, "The magnitude of the benefit or the
22 loss of the benefit is uncertain."

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1 It is hard to understand why a product
2 with uncertain and probably zero benefit to
3 agriculture and the environment in the long run
4 would be approved when the costs are certain and
5 dramatic, so dramatic, in fact, that the USDA's
6 preferred alternative of deregulating three
7 varieties of 2,4-D tolerant corn and soybeans, if
8 selected, coexistence as we know it in agriculture
9 will be unfeasible.

10 Already, specialty crop farmers have
11 been exposed to pesticide drift of glyphosate and
12 2,4-D from neighboring fields, which has affected
13 plant health and the livelihoods of the impacted
14 farmers who have born the financial burden for the
15 lost value of their crops.

16 Although Dow and the USDA claim that the
17 new formulation of 2,4-D will be less volatile
18 making drift less of an issue, there are no
19 enforcement mechanisms that have been put in place
20 by Dow, the USDA, or the EPA, that will ensure
21 that farmers are using the specific formulation.

22 It is very likely that instead farmers

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1 will continue to use the cheaper, highly volatile,
2 2,4-D variation in a new wave. The draft of EIS
3 mentions that 2,4-D can now be used for post-
4 emergent control on 2,4-D tolerant soybeans, which
5 has never been possible before. This will mean
6 more applications on more acres of a particularly
7 dangerous herbicide that we should be working to
8 scale down, rather than ramp up.

9 Next, more applications of 2,4-D and
10 glyphosate will negatively impact the environment
11 as well as agriculture. The EIS clearly states
12 that, "Biodiversity could decrease relative to the
13 no-action alternative."

14 Additionally, once these crops are
15 approved and weeds develop resistance to the
16 combination of glyphosate and 2,4-D, farmers will
17 face significant costs due to reduced yields and
18 increased production expenses to combat weed
19 infestation. These costs can range from \$12 to
20 \$50 an acre or as much as \$12,000 for an average
21 sized corn or soybean farm.

22 U.S. farmers have found herbicide-

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1 resistant weeds in their fields, they've changed
2 farming methods to control them resulting in high
3 weed control costs and even a return to tillage
4 and hand hoeing.

5 And finally, there's of course the human
6 health cost of farmers, farm workers, and
7 consumers who are exposed to residues of more 2,4-
8 D on their food. The effects of 2,4-D and dicamba
9 on human health, including a link with Non-
10 Hodgkin's Lymphoma, are well documented and
11 continued use of herbicides--of this herbicide in
12 agriculture will endanger agricultural workers and
13 the general public.

14 The bottom line is that USDA must not
15 approve any herbicide tolerant crops, including
16 Dow's Enlist corn and soybeans, until the Plant
17 Protection Act rules are revised to adequately
18 cover the risks of genetically engineered crops.
19 Until then, the USDA should focus its attention on
20 the proliferation of non-chemical weed control
21 methods because if we continue down this path of
22 high input agriculture, we will be fighting

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1 herbicide-resistant weeds indefinitely.

2 Thank you for your consideration of this
3 comment.

4 MR. GEORGE: Thank you, Genna. We have
5 a couple more callers in the queue. If the next
6 caller would please go ahead and please be sure to
7 give us your name and spell your name, please.

8 OPERATOR: You have three questions
9 remaining.

10 MS. BYRUM: Hello. This is Dianne Byrum
11 and I would like to submit comments on behalf of
12 the Michigan AgriBusiness Association.

13 I am writing on behalf of the Michigan
14 AgriBusiness Association, a 450-member trade
15 organization representing crop production input
16 manufacturers, distributors, and retailers of feed
17 and grain handlers and renewable fuel producers in
18 Michigan.

19 Our organization strongly supports the
20 approval of Dow AgriScience's Enlist 2,4-D
21 tolerant corn and soybeans and the Enlist Weed
22 Control System. At a time when meeting the demand

1 for more food to feed a growing population,
2 production losses to weeds are unacceptable.
3 Growers are searching for solutions, which will
4 continue to support their efficient and
5 environmentally conscious production practices.

6 The Enlist Weed Control Strategy of
7 genetic material, Enlist 2,4-D tolerant soybeans
8 and corn, and the new 2,4-D product, represent new
9 technologies in the Enlist Weed Control System
10 that will especially help farmers in their efforts
11 to control tough new weeds.

12 Weed control is one of the greatest
13 challenges agriculture faces every year. Weeds
14 crowd the seedlings soon after emergence,
15 threatening yield potential. In addition, each
16 weed can produce tens of thousands of seeds that
17 threaten subsequent crops in neighboring fields.
18 Historically, effective weed management takes
19 considerable time and expense. Multiple
20 applications of a wide variety of herbicides to
21 control a wide variety of weeds and grasses have
22 had varying degrees of success.

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1 Multiple applications of herbicide and
2 narrow windows of timing make it very difficult to
3 manage weed pressures with conventional tools.

4 In addition, existing chemicals used for
5 weed control can damage plants and reduce the crop
6 yield. Again, on behalf of the Michigan
7 AgriBusiness Association, we strongly support the
8 full deregulation of Dow AgroSciences Enlist 2,4-D
9 tolerant corn and soybeans.

10 We appreciate your consideration. Thank
11 you.

12 MR. GEORGE: Thank you for your comment.
13 We have another caller in the queue. If you
14 would, say and spell your name and go ahead with
15 your comment, please.

16 OPERATOR: You have two questions
17 remaining.

18 MR. ZELHART: My name is Dale Zelhart.
19 I work for Plunk Brothers in Mansfield, Illinois.
20 We grow 3,000 acres of seed corn and conventional
21 corn as well as 3,000 acres of seed beans and
22 conventional beans.

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1 I have been involved in ag my entire
2 life. I grew up on a farm 60 miles south of
3 Chicago. I have a business degree and economics
4 degree from St. Joseph's College in Rensselaer,
5 Indiana.

6 Before I started working for Plunk
7 Brothers in 2003, I was a plant manager at a
8 retail fertilizer plant for 12 years. I have been
9 involved in the crop protection business for 22
10 years. We have been using Round Up Ready Tech
11 since it was first introduced in 1996 with great
12 success until the past three to four years.

13 The past few years, weeds like waterhemp
14 and Mare's Tail have become increasingly harder to
15 control and in some instances, we have not been
16 able to control them at all.

17 We do not yet have a catastrophe, but if
18 we do not get some new technology to help control
19 these weeds, it's just a matter of time before
20 things will get beyond our control. We need the
21 new Enlist technology as soon as possible to help
22 control these and many other weeds that have not

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1 yet made it to our area.

2 Plunk Brothers, in the past, have no-
3 tilled their soybeans for 20-plus years and we
4 have had to scale that back because of the
5 difficulty in controlling some weeds, especially
6 Mare's Tail.

7 Since we are not no-tilling as much as
8 we did in the past, we are more susceptible to
9 erosion from wind and water and the last thing we
10 want to do is lose our soil because it is some of
11 the most productive soil in the world.

12 Enlist will have great benefit to Plunk
13 Brother's operation and farmers throughout the
14 Midwest in cost and time savings, in ability to go
15 back to our no-till system that we have had to
16 reduce the use of over the years.

17 In the summer of 2013, I was able to
18 plant a USDA regulated Enlist research corn plot.
19 My experience with the Enlist trait and the Enlist
20 DUO herbicide was tremendous. Enlist DUO and
21 Enlist trait, both performed above my
22 expectations. The crop tolerance was excellent

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1 and their weed control was better than anything I
2 have used in the post- application arena in
3 several years.

4 The low odor and low drift control were
5 a concern to me, but after using the products,
6 those concerns no longer exist. I am very
7 confident that corn and soybean growers across the
8 country will be able to Enlist DUO effectively and
9 safely with virtually no environmental impact.

10 We currently grow about 1900 acres of
11 seed corn and we have to work closely with our
12 neighbors because of the isolation requirements
13 for seed corn. I know many in our industry are
14 worried about drift and coexistence with our
15 neighbors. Well, I can tell you that I do not
16 believe that will be a problem because we have had
17 to do it in the past and we can do it in the
18 future.

19 When Round Up first came out, everyone
20 was worried about spraying the wrong fields or
21 drifting out to susceptible crops, but we were
22 able to make it work without any serious problems.

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1 In closing, I feel very strongly that
2 all the issues that have been raised concerning
3 Enlist are being dealt with by Dow's Stewardship
4 Plan and producers across the country will work
5 together to meet these concerns because all
6 producer's livelihood is at stake.

7 If there's one thing that is for sure,
8 resistance weeds do not discriminate. They will
9 show up on any far no matter what type it is.

10 My name is Dale Zelhart. I thank you
11 for listening.

12 MR. GEORGE: Dale, thank you so much for
13 your comment. We have another caller in the
14 queue, if the next caller would please go ahead
15 with your comment.

16 OPERATOR: You have three questions
17 remaining.

18 MS. CAUTHEN: My name is Leigha Cauthen
19 with the Alabama AgriBusiness Council.

20 On behalf of the members of the Alabama
21 AgriBusiness Council, I would like to thank you
22 for the opportunity to comment on the deregulation

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1 of Dow AgroScience's Enlist crops.

2 We appreciate that the USDA has kept
3 this process moving forward. The Alabama
4 AgriBusiness Council supports farmers having a
5 choice to use safe and valuable agriculture
6 technologies that increase yields and
7 profitability. As the global demand for food
8 increases, we must support the necessary
9 technologies to remain sustainable, profitable,
10 and globally competitive.

11 Enlist crops will help farmers manage
12 glyphosate-resistant weeds without having to
13 return to aggressive tillage practices, which
14 would adversely impact soil, air, and water
15 quality. 2,4-D is a widely used herbicide with an
16 extensive history of safe and effective use, and
17 the new herbicide formulation has been used on
18 Enlist crops and is significantly less volatile
19 than current forms of 2,4-D.

20 I would like to express my strong
21 support for the deregulation of Enlist 2,4-D on
22 behalf of members of the Alabama AgriBusiness

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1 Council and I thank the USDA for completing the
2 DEIS.

3 I would like to encourage USDA to
4 complete the regulatory process as soon as
5 possible because this technology is desperately
6 needed for our farmers.

7 Thank you for the opportunity to
8 comment. Leigha Cauthen, Alabama AgriBusiness
9 Council.

10 MR. GEORGE: Thank you, Leigha. We have
11 another commenter ready to go ahead please. Next
12 commenter, go ahead with your comment.

13 OPERATOR: You have two questions
14 remaining.

15 MR. TOLAR: Good afternoon. My name is
16 Bryan Tolar and I'm with the Georgia AgriBusiness
17 Council. I too thank you for the opportunity to
18 make some comments today.

19 As President of the Georgia AgriBusiness
20 Council, we represent over 825 different agri
21 business across the state. It is, by far, the
22 largest industry in our state.

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1 And our member companies support farmers
2 having the choice to plant the Enlist technology
3 moving forward. The tolerance that we need in
4 these products for the weeds that we have in our
5 state is very important to us. In Georgia, we've
6 seen a tremendous amount of growth over the last
7 eight years of glyphosate tolerant weeds and it's
8 become an increasing problem and I've even heard
9 some people on the call today talk about the
10 challenges of weed control and suggesting hand
11 weeding, which to me shows that they are
12 absolutely out of touch with production
13 agriculture.

14 We have a strong commitment to the
15 environment, we always have, and we want to
16 continue that practice and the one way we can
17 continue to do that is to push farmers to utilize
18 conservation tillage. Conservation tillage is a
19 way that we can also reduce our water usage. If
20 we don't have the tools, such as Enlist and other
21 products that are out there, for our farmers to
22 utilize, then we can't put these types of

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1 technologies in place and then we are wasting fuel
2 and we're also wasting our resources and that's
3 not in the benefit of anybody.

4 This is also important to us herein
5 Georgia because poultry production is our largest
6 individual commodity that's produced. Not only is
7 it the largest in Georgia, but Georgia's the
8 largest poultry producer in the nation, and as
9 you're probably aware, chickens like a lot of corn
10 and they like soybeans. So, this is a tremendous
11 benefit to us so that we can feed this very
12 important industry here in our state and also to
13 provide these resources not only across the U.S.,
14 but all over the world as we are very proud of the
15 exports that we provide, not only in poultry, but
16 also beef, pork, and other products.

17 As we look to fuel the future of our own
18 agricultural growth, we look at a lot of different
19 varieties of opportunities and looking for
20 technology. Enlist provides the resources that we
21 need to do that.

22 We appreciate your consideration. We

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1 appreciate USDA's action and we hope that you'll
2 consider our comments as you move forward on the
3 decision to deregulate all three of the Enlist
4 corn and soybean traits. Thank you very much.

5 Again Bryan Tolar, President of the Georgia
6 AgriBusiness Council.

7 MR. GEORGE: Thank you, Bryan. We have
8 another caller in the queue, if you would please
9 go ahead and make your comment please.

10 OPERATOR: You have one question
11 remaining.

12 MR. RAWLING: My name Henry Rawling
13 (phonetic), I'm representing Sustainable Path, a
14 global organization to sustainable agriculture.

15 I was wondering if the USDA was aware of
16 Dr. Leonardo Melgarejo. He's a doctor for CTNBio
17 in Brazil. He's a doctor in agronomy and an
18 official of the Ministry of Rural Development.

19 He has recently done a report on these
20 three traits of soy and corn and regarding what
21 these traits actually contain, and he has found
22 that they contain less vitamin E, the minimum

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1 shown in scientific literature and a higher
2 content of phytic acid, which can lead to growth
3 problems in children.

4 If this is the case, the GMO is not
5 substantially equivalent to the non-GMO parent,
6 and may present a health risk depending on the
7 levels found in testing in America.

8 Another concern is the metabolization of
9 2,4-D in GMO plants. There is very little work on
10 this topic as Dow does not want to release its own
11 data. The glyphosate tolerant plants, 28 percent,
12 60 percent of glyphosate sprayed on the plant is
13 metabolized by the bladder. The rate of
14 metabolization is similar in GM plants resistant
15 2, 4-D, this can be very hazardous to human
16 health. There is vast scientific literature
17 regarding its toxicity.

18 That's my comment. Thank you.

19 MR. GEORGE: Thank you for your comment.
20 We have another caller in the queue. If you would
21 go ahead and make your comment now, please?

22 OPERATOR: You have one question

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1 remaining.

2 MR. PODOLL: Good afternoon, everybody.
3 This is David Podoll. I have been a farmer in
4 southeastern North Dakota for 40 years. We raise
5 specialty crops, triticale, hairy vetch,
6 buckwheat, proso millet, a variety of vegetable
7 seeds from corns to tomatoes, onions, squash,
8 pumpkins, melons, many of which we developed on
9 our farm from our own breeding program.

10 We had an incident of drift on our farm
11 this last season from a combination of 2,4-D and
12 glyphosate that cost us \$180,000 worth of damage
13 and we don't consider that we will be able to
14 survive if Enlist is allowed to be sold and used.
15 We consider it a very serious thing for our
16 operation and we consider many horticultural crops
17 unable to exist in our area as a viable cropping.

18 So, thanks for your consideration.

19 MR. GEORGE: Thanks, David, for your
20 comment. Let me remind folks if you're listening,
21 if you want to make a comment press one then zero
22 on your telephone keypad and we'll know that you

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1 want to make a comment and the operator will come
2 on and let you know.

3 At the moment we have no other callers
4 in the queue. I'm going to take a little pause
5 here and if someone would like to make a comment,
6 again, press one then zero on your telephone
7 keypad and we'll come right back on. In the
8 meantime, we're going to take a little pause and
9 if someone wants to make a comment, we'll be back.
10 In any case, we'll be back every few minutes just
11 to check in and we encourage folks to make
12 comments if they care to.

13 So, we're going to take a little pause
14 at this time.

15 (Pause.)

16 MR. GEORGE: I understand we have
17 caller. So, caller, please go ahead with your
18 comment.

19 OPERATOR: You have one question
20 remaining.

21 MR. SOLOMON: My name is Phillip
22 Solomon. I'm a weed scientist at Kansas State

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1 University and in recent years I've been working
2 almost exclusively with glyphosate-resistant
3 weeds. They are threatening agriculture as we
4 know it at the present time and therefore I
5 believe that Enlist crops are needed as an
6 additional tool to help growers manage the
7 increasing abundance of glyphosate-resistant weeds
8 and to help reduce the need for tillage.

9 In the area that I work, tillage is a
10 serious threat to sustainability of farms in the
11 dryer regions and I think that tillage is actually
12 a threat--will threaten the conservation gains
13 that have been achieved over the past couple of
14 decades.

15 Now, 2,4-D, you would know, is one of
16 the oldest of the modern day herbicides and has
17 been used extensively for more than 60 years with
18 very few examples of evolved resistance to 2,4-D
19 in weed species, and I believe when used properly,
20 there is considerable safety in its use.

21 Now, one concern we have often heard
22 about 2,4-D is the concern of volatility and

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1 whereas the new formulation that has been
2 developed will be used in the Enlist crops, it
3 cannot become volatile. It is considerably less
4 volatile than the current man and ester
5 formulations that are available, and I believe
6 there is actually considerably improved safety and
7 minimal risk of off-target movement of vapors to
8 other susceptible crops.

9 I have had the opportunity to work with
10 the technology and I believe that the proper
11 protocols have been followed and I believe that
12 there is minimal adverse risk or environmental
13 impact from this technology and so I am very much
14 in favor of its continued development.

15 I thank you for the opportunity to
16 comment. Thank you.

17 MR. GEORGE: Great. Thank you so much
18 for your comment.

19 OPERATOR: You have zero questions
20 remaining.

21 MR. GEORGE: We have no commenters in
22 the queue at the moment. I will remind those who

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1 may be listening and may want to comment to please
2 press one then zero on your telephone keypad and
3 we'll know that you'd like to make a comment.

4 Being that there are none at the moment,
5 we'll take a pause. If you should have one in
6 there, we'll see that and come back on.

7 We have one. Okay, so, caller, please
8 go ahead with your comment.

9 OPERATOR: You have one question
10 remaining.

11 MR. GASSER: Hi. This is Greg Gasser
12 from Corning, Iowa. I'm a soybean and corn farmer
13 here and I'd really like to speak in favor of
14 deregulating the Enlist traits for both corn and
15 soybean in the United States.

16 As I read through the messaging from
17 USDA that you've done a really extensive
18 evaluation of Enlist crops and really over a wide
19 range of alternatives and I really support that
20 thorough process of making sure that it's a good
21 thing to deregulate these new traits, and I really
22 would like to speak in favor of that.

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1 We've used 2,4-D on our farm for many,
2 many years safely. We've used it around the
3 country and around the world safely and I just
4 think it's been a really great help to have the
5 ability to use 2,4-D. It will be an even much
6 better help to help us to address weed resistance
7 problems that we have with glyphosate, not only in
8 Iowa, in my part of Iowa, but around the country.

9 So, I think it's going to be a really
10 important tool for soybean farmers and corn
11 farmers in the United States to be able to use
12 these new products so we can continue using the
13 no-till and the conservation tillage that we've
14 been able to use to avoid the erosion problems,
15 the soil health problems with massive tilling that
16 we have used if we use some of our old products
17 that we used 30 or 40 years ago.

18 I'd really like to speak in favor of
19 this and also remind you and everyone that the new
20 formulation of 2,4-D is the Colex-D formulation
21 that Dow would like to use, is even less volatile
22 than the formulations that we have a long history

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1 of using. So, I highly would encourage you to
2 deregulate that, let us as farmers in the United
3 States use these new tools to keep our soil in
4 place to maintain our conservation practices and
5 feed everyone. Thank you.

6 MR. GEORGE: Great. Thanks for your
7 comment.

8 OPERATOR: You have zero questions
9 remaining.

10 MR. GEORGE: We have no commenters in
11 the queue at the moment. I will mention once
12 again, if you'd like to comment, please press one
13 then zero on your telephone keypad and we'll see
14 that and we'll give you your opportunity to speak
15 right away.

16 However, seeing none at the moment,
17 we're going to take a short pause. You'll hear
18 some music. We'll be coming back on every few
19 minutes. In the meantime, if you should hit one
20 and 0, we'll come back very quickly to receive
21 your comment.

22 So, having said that, we're going to

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1 take a short pause at this time. Thanks.

2 (Break.)

3 MR. GEORGE: And we're back. We still
4 have no callers in the queue, however, I'd just
5 like to remind folks who may be listening, if
6 you'd like to make a comment, please press one
7 then zero on your telephone keypad and we will get
8 you on and you can make your comment as quickly as
9 possible.

10 Do we have one? We do have one, so
11 caller, if you could go ahead with your comment,
12 please.

13 OPERATOR: You have one question
14 remaining.

15 MR. COWAN: Yes, this is Wade Cowan
16 (phonetic). I'm a producer from West Texas. My
17 family's been farming and ranching in Texas since
18 before it was a state. We have farmed on the high
19 plains of Texas for over 100 years and we are
20 really seeing an increase, in the last 20 years
21 with the improved genetics of crops, and the
22 existence of the Round Up Ready trait has really

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1 helped us.

2 And on the high plains of Texas, we
3 exist in an area of extremes and the use of crop
4 rotation has allowed us to reduce tillage and now
5 what we really need is some more effective
6 chemical rotation, that's why I'm in support of
7 the Dow Enlist program and using 2,4-D as well as
8 glyphosate. I believe in our area that it will
9 actually reduce the amount of chemicals that we
10 put on each crop because we will be able to
11 effectively use the two different modes of action
12 throughout the different planting cycles and the
13 different crops we'd use.

14 One thing that we found in our area is
15 that the 2,4-D mode of action works much better in
16 drought conditions as we've had the last few years
17 out here. Round Up seems to be very good on a
18 plant that's actively growing and doing well, but
19 it does not do so well when the plant is stressed
20 and 2,4-D does very well in both conditions
21 because when the plant is stressed, it seems to do
22 very well at killing those short-term crops.

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1 I'd also like to answer some of the
2 questions that have been raised about coexistence
3 in that we raise crops in an area that has quite a
4 lot of--a number of acres of grapes, which are a
5 highly sensitive crop to 2,4-D. We've been able
6 to coexist with those crops with very strict
7 stewardship practices and Dow's program of helping
8 work with the farmers and making even more
9 stewardship practices that will be more effective
10 even than what we already have, will be very
11 effective. So, I really would encourage USDA to
12 deregulate the Dow Enlist program and thank you
13 for allowing me to have these comments.

14 MR. GEORGE: Thank you for your comment.
15 A reminder. If you'd like to make a comment,
16 press one then 0--

17 OPERATOR: You have zero questions
18 remaining.

19 MR. GEORGE: --on your telephone
20 keypad, one then 0, and we'll know that you'd like
21 to make a comment. Being that we have none at the
22 moment, we're going to take another pause, you'll

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1 hear some music, and we'll come back every few
2 minutes just to check in and see if anyone would
3 like to make a comment.

4 In the meantime, anyone hitting one then
5 0, we shall see that and we'll be right back to
6 take that. So, having said that, we'll take a
7 short pause. Thanks.

8 (Break.)

9 MR. GEORGE: And we have a commenter
10 ready to comment. Caller, if you would go ahead
11 with your comment, please.

12 OPERATOR: You have one question
13 remaining.

14 MR. MURPHY: Hi. This is Danny Murphy.
15 I'm a soybean and corn farmer from Mississippi and
16 I think Mississippi farmers want and need this
17 2,4- D technology to deal with our glyphosate weed
18 resistance we have all over the state.

19 Presently, on my farm, I don't have
20 resistant pig weeds, but I'm always afraid that
21 they're going to show up just every time I spray
22 or every new crop year.

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1 So far, we've been successful in trying
2 to battle those weeds, but I think this new
3 technology would really give me the ability to use
4 multiple modes of action that I don't have today
5 and maybe to even prevent glyphosate-resistant
6 weeds from showing up on my farm at all.

7 I have adopted the use of no-till over
8 the last few years by the use of using Round Up
9 Ready technology and I just think this complements
10 that. If I do get resistant weeds then I may be
11 forced to continue with--to go back to using
12 conventional tillage, which would cost a lot of
13 time and fuel and labor that would make me not
14 very competitive.

15 So, I think it really offers some
16 benefits in that way too.

17 I have used 2,4-D on my farm for quite a
18 few years and never had any incidents or problems
19 with applying it and I understand that the new
20 technology, the new formulation, will really be
21 even a lower volatility and probably prevent the--
22 maybe offsite movement that might would damage

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1 other crops.

2 And as I've reviewed the literature on
3 this and looked at the stewardship requirements,
4 you know, I'm already using the nozzle technology
5 that's been recommended and I can understand and I
6 see the techniques that are going to be required
7 to apply it safely and that, to me, you know, it's
8 not a lot new. I think farmers are doing that
9 with the new sprayers we have today, we understand
10 how to use those and make sure that we don't get
11 that offsite movement.

12 I want to thank USDA and APHIS for
13 completing the draft EIS. I hope that this
14 technology will soon be available, that you can
15 complete this regulatory process in the near
16 future and allow us to move this technology as we
17 move forward. We need it to be competitive in the
18 future. So, thank you.

19 MR. GEORGE: Thank you for your comment,
20 Danny. If I could ask you to please spell your
21 name for us, please.

22 MR. MURPHY: D-A-N-N-Y M-U-R-P-H-Y.

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1 MR. GEORGE: Great. Thank you so much.

2 And I see we have another commenter on the line.

3 If the next caller could please go ahead with your

4 comment.

5 OPERATOR: You have one question

6 remaining.

7 MR. STUEVER: This is Jim Stuever in

8 Dexter, Missouri.

9 MR. GEORGE: Go ahead.

10 MR. STUEVER: Okay. I wanted to comment

11 that I think the Enlist system will be very good

12 addition to my weed control program. I currently

13 farm southeast Missouri with corn, soybeans, and

14 cotton. I have resistant pig weed at the present

15 time, need another tool in my toolbox to be able

16 to effectively control these weeds without any

17 adverse effect on the environment and without

18 having to change my tillage practices. I have

19 minimum till to minimize erosion and improve my

20 water quality.

21 I am familiar with 2,4-D for the fact

22 that I've farmed for nearly 40 years and have used

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1 it in the past. The new Enlist 2,4-D choline will
2 be a very good addition to that because it will
3 address the volatility problem. I do understand
4 that it will require stewardship to be able to
5 effectively use it without damage to neighboring
6 crops, but it is not an impossible task to do with
7 today's modern technology and equipment that we
8 have available.

9 And presently, we already employ those
10 methods and I do believe that the program will be
11 a very good addition for many of the farmers in my
12 area and I look forward to being able to have that
13 made available to us. Thank you.

14 MR. GEORGE: Thank you, Jim. Can I ask
15 you to spell your name for us, please?

16 MR. STUEVER: It's Jim Stuever, S-T-U-E-
17 V-

18 E-R.

19 MR. GEORGE: Thank you, Jim. Thanks for
20 your comment.

21 OPERATOR: You have zero questions
22 remaining.

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1 MR. GEORGE: We have no callers in our
2 queue at the moment. I'll remind folks who may be
3 listening if you'd like to make a comment to
4 please press one then zero on your telephone
5 keypad. I see that we have no one in the queue at
6 the moment. We'll take another pause. We'll be
7 coming back every few minutes. However, if you'd
8 like to make a comment, press one then zero and
9 we'll come back and pick up the comment as fast as
10 we can.

11 So, thanks so much, and we'll take a
12 short pause. Thank you.

13 (Break.)

14 MR. GEORGE: And we're back to invite
15 anyone listening in on the call, if you'd like to
16 make a comment, we invite you to do so. Please
17 press one then zero on your telephone keypad, and
18 we will get to comments as quickly as we can. And
19 we do have one commenter in the queue, so, Caller,
20 if you would go ahead, please.

21 OPERATOR: You have one question
22 remaining.

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1 MR. ANDERSON: My name is Dan Anderson.
2 I'm a third-generation producer out of
3 northeastern Colorado, and I'd like to make a
4 statement about the Enlist technology.

5 MR. GEORGE: Sure, go ahead. And would
6 you spell your name, please?

7 MR. ANDERSON: Dan Anderson, D-A-N, A-N-
8 D-

9 E-R-S-O-N.

10 MR. GEORGE: Thank you.

11 MR. ANDERSON: As I said, I'm a third-
12 generation producer out of northeastern Colorado.
13 First off, I'd like to thank USDA for moving along
14 the Environmental Impact Statement and the draft
15 EIS in a very timely way. It's always nice to
16 know that USDA is working for us as producers and
17 basing all of your information and decisions on
18 sound science. And I'd like, of course, to urge
19 USDA to keep the review process moving forward
20 expediently and hopefully getting Enlist
21 technology available for us as producers in 2015
22 anyway.

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1 Challenges that we meet every day on the
2 farm are growing as far as resistance levels. Our
3 operation was actually involved in one of the test
4 plot sites for the Enlist corn technology last--
5 in the summer of 2013, and I would say that both
6 the efficacy of the product and the safeness of
7 the product were very well received by this
8 operation, and it allows us another tool in our
9 toolbox to be able to go after some trouble weeds.

10 We in northeastern Colorado don't have
11 the problems that some other areas have right now,
12 but we'd like to keep this technology and other
13 technologies in the pipeline so that we can keep
14 fighting against having other resistance issues
15 and some of the things that are happening in other
16 parts of the country.

17 We in agriculture have been asked for a
18 long time to feed the world, and, you know, it's a
19 very rewarding job. And part of that feeding the
20 world comes with technology, and whether it's
21 equipment technology or seed technology, they're
22 both very important to us to be able to facilitate

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1 our jobs as good producers and good stewards of
2 the land.

3 So I would encourage USDA to move
4 forward with the Enlist corn and soybean
5 deregulation, and hopefully by 2015 we can use the
6 technology. You know, I just wanted to come on
7 and voice my opinion in favor of things, and I
8 appreciate the opportunity to be able to do that.

9 MR. GEORGE: Thank you very much for
10 your comment.

11 MR. ANDERSON: You bet.

12 OPERATOR: You have zero questions.

13 MR. GEORGE: And we have no callers in
14 the queue at the moment, so once again I will
15 remind folks, if you want to comment, press one
16 then zero on your telephone keypad. And being
17 that there are none at the moment, we will take
18 another pause. We'll be back every few minutes.
19 In the meantime, if we see someone waiting to
20 speak, we'll come back and you speak that comment.
21 One then zero on your telephone keypad. We'll be
22 back in a few minutes. Thanks so much.

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1 (Break.)

2 MR. GEORGE: Hi, we're back. We're here
3 to take public comments on two petitions from Dow
4 for determinations for non-regulated status for a
5 corn and two soybeans that have been genetically
6 engineered to be resistant to 2, 4-D and other
7 herbicides. So we're here to take comments. If
8 you'd like to make a comment on the draft EIS for
9 those petitions, please press one then zero on
10 your telephone keypad.

11 We have no callers in the queue at the
12 moment. However, we invite you, if you're on the
13 line and would like to make a comment, to please
14 do so. Just hit one and zero, we'll see that, and
15 we'll come on to take your comment as quickly as
16 we can.

17 And having said that, we still have no
18 one in the queue, and so we'll break away once
19 again, and we'll be checking back in every few
20 minutes. Thanks so much.

21 (Break.)

22 MR. GEORGE: And we have a commenter on

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1 the phone. Caller, if you would go ahead with
2 your comment, please.

3 OPERATOR: You have one question
4 remaining.

5 MS. DARROW: Hi. My name is Roxanne
6 Darrow (phontic) and I'm an organic farmer in Los
7 Altos Hills, California.

8 MR. GEORGE: Welcome and go ahead with
9 your comment.

10 MS. DARROW: Thank you. I'm part of a
11 coalition of farmers and other groups that has
12 formed to express our opposition to Dow's new 2,
13 4- D resistant seeds. Sustainable weed management
14 is possible without dumping dangerous drift-prone
15 herbicides on our soil. And as a new organic
16 farmer, I'm facing many obstacles to enter this
17 profession. If the USDA approves Dow's 2, 4-D
18 seeds, then it will make it more difficult for me
19 to find land capable of achieving USDA organic
20 certification.

21 The USDA needs to break the cycle of
22 super weeds instead of exacerbating the problem by

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1 approving even more toxic methods that will create
2 new 2, 4-D resistant weed.

3 Please consider the economic and
4 biological damage these seeds will cause to
5 conventional and organic farmers. Thank you.

6 MR. GEORGE: Thank you for your comment.

7 MS. DARROW: Thanks.

8 OPERATOR: You have zero questions
9 remaining.

10 MR. GEORGE: And we have no other
11 callers in the queue. I would remind folks who
12 may choose to make a comment to press one then
13 zero on your telephone keypad, and we'll know that
14 you're ready to make a comment. Seeing, however,
15 that we have none at the moment, we will take a
16 break and be back in a few minutes. In the
17 meantime, hit one then 0, we'll see that, and
18 we'll break back in if someone has a comment.

19 So we'll take a brief pause.

20 (Break.)

21 MR. GEORGE: And we have a commenter on
22 the line in the queue, so, Commenter, if you would

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1 go ahead with your comment, please. Remember to
2 say your name and spell your name, please. Go
3 ahead.

4 OPERATOR: You have one question
5 remaining.

6 MS. PODOLL: Hi, this is Theresa Podoll.
7 The name is spelled T-H-E-R-E-S-A, last name P-O-
8 D-

9 O-L-L.

10 MR. GEORGE: Go ahead, Theresa.

11 MS. PODOLL: So my comment is I'm
12 opposed to the deregulation of 2, 4-D, Dow
13 AgroSciences' 2, 4-D Ready crops. The reason for
14 that is I'm an organic farmer, and I feel that my
15 crops would be particularly vulnerable to the GE
16 crops that surround it. USDA says that they want
17 to help rural America thrive and expand economic
18 opportunity and preserve our natural resources.
19 But if they deregulate Dow 2, 4-D resistant crops,
20 it will threaten my economic opportunity and my
21 opportunity to farm my land in the way that I
22 would want to.

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1 So USDA would fail American farmers and
2 rural communities and fail its mission if it
3 deregulates these crops.

4 MR. GEORGE: Theresa, thank you for your
5 comment.

6 OPERATOR: You have zero questions
7 remaining.

8 MR. GEORGE: And we have no other
9 callers in the queue, so we will take a break.
10 Again, if you'd like to make a comment, one then
11 zero on your telephone keypad. Also, I should
12 mention if you've already made a comment and would
13 like to comment some more, we certainly have time
14 for that and would welcome if you'd like to call
15 in again and add something to a previous comment.

16 So seeing that there's no one in the
17 queue, we are going to break away again, and so
18 we'll come back right away if someone has a
19 comment to make--oh, we do have a commenter.
20 Okay. Caller, remember to say and spell your name
21 for us, please, and please go ahead.

22 OPERATOR: You have one question

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1 remaining.

2 MS. PODOLL: Again, this is Theresa
3 Podoll. The name is spelled T-H-E-R-E-S-A, last
4 name is P-O-D-O-L-L. And I have a question
5 regarding the deregulation. Would Dow require the
6 use of its Enlist herbicide, or would farmers have
7 the option of using the more volatile formula of
8 2, 4-D, especially given that it's lower cost, and
9 so it creates a market incentive for them to
10 continue using it? So I would ask that question.

11 MR. GEORGE: Okay. I frankly don't know
12 the answer to that question, and we're not really
13 here to answer questions but to take comments. So
14 the fact that you've raised it, that will be on
15 the record and in the transcript and will be
16 considered in the development of the final EIS
17 petition.

18 MS. PODOLL: Okay, and I would make one
19 more comment, too, that even though Dow has
20 developed this less volatile formula, you know, I
21 live in--I'm surrounded by genetically modified
22 crops, and Roundup, we were told that Roundup was

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1 not supposed to drift either. Well, we've
2 experienced drift from Roundup. And so even
3 though there are idealized best practices for
4 preventing drift, there are no absolutes in farm
5 country and drift happens. And I know that from
6 experience.

7 And so, even though Enlist is supposed
8 to be a less volatile formula, that does not give
9 me much comfort, especially with the volume of
10 genetically modified crops that surround our small
11 organic farm. And if I am drifted upon, it is my-
12 - the onus of proving who drifted on me is in my
13 court, and it's--2, 4-D can travel much further
14 than Roundup can, and if you combine 2, 4-D and
15 Roundup, the combination of those two chemicals
16 creates more damage than either of those
17 herbicides alone.

18 So that is of great concern to me, and
19 if I have to spend my time litigating drift events
20 instead of farming my farm, that strips me of my
21 opportunity to farm.

22 MR. GEORGE: Okay. Thank you so much

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1 for your comment.

2 MS. PODOLL: Thank you.

3 OPERATOR: You have zero questions
4 remaining.

5 MR. GEORGE: Okay. We have no callers
6 in the queue at the moment. Again, I'll remind
7 folks, one then zero on your telephone keypad if
8 you'd like to make a comment. We welcome all
9 comments. If you've commented already and would
10 like to say more, that would be fine as well.
11 However, seeing that there are no calls in the
12 queue at the moment, we will take a short pause
13 and be back in a few minutes. Thanks so much

14 (Break.)

15 MR. GEORGE: And we have a commenter on
16 the line. Would you please go ahead with your
17 comment?

18 OPERATOR: You have one question
19 remaining.

20 MS. PODOLL: This is Theresa Podoll
21 again. I'm providing further comment. My name is
22 spelled T-H-E-R-E-S-A, last name is P-O-D-O-L-L.

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1 And I stated earlier that we are surrounded by GE
2 Roundup Ready crops, and this has led to the rapid
3 selection of 21 species of glyphosate-resistant
4 weeds. And so the GE herbicide-resistant
5 technology has really failed in its promise to
6 provide sustainable weed control because of the
7 development of herbicide-resistant weeds. And I
8 remember when this technology was released, and it
9 was stated at that time already that there was a
10 high probability that if farmers did not manage
11 this technology properly, that herbicide-resistant
12 weeds would develop, and that has, in fact,
13 happened.

14 And Albert Einstein is widely credited
15 with the quote that, "The definition of insanity
16 is doing the same thing over and over again and
17 expecting a different result." There are already
18 weeds resistant to synthetic auxin herbicides, and
19 that's the class that dicamba and 2, 4-D belong
20 to. So since there's already numerous resistant
21 weeds to that, it's prevalent in the plant world
22 that auxin resistance is already there, so we're

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1 going to find that we will have even more rapid
2 selection for resistance to these auxin
3 herbicides. And that is not sustainable, and we
4 certainly have other methods of weed control that
5 are much more sustainable.

6 So in addition to that, I would also
7 like to add comments about the health problems
8 that would be associated with the release of 2, 4-
9 D and dicamba ready crops. These two herbicides
10 are linked to major health problems, including
11 cancer, especially non-Hodgkin's lymphoma. It has
12 been linked to lower sperm counts, liver disease,
13 Parkinson's disease. It adversely affects
14 hormonal activity in our bodies, our reproductive
15 systems, neurological and immune systems. And
16 besides that, 2, 4-D has been shown to be
17 contaminated with dioxins, which are highly toxic
18 chemical compounds, and those bio-accumulate. So
19 that can lead to dangerous levels of exposure.

20 And I would add the question of since
21 they have developed this less volatile formulation
22 of 2, 4-D that contains choline salts, does that

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1 make it more water soluble? And what happens to
2 these chemicals once they're released to our
3 environment? Are we going to find them in our
4 water table the same as we have now found Roundup
5 glyphosate to be present in the water table in
6 Iowa?

7 Those are my questions, those are my
8 concerns, and I would urge USDA not to deregulate
9 these crops.

10 MR. GEORGE: Thank you for your comment.

11 MS. PODOLL: Thank you.

12 OPERATOR: You have zero questions
13 remaining.

14 MR. GEORGE: At this time we have no
15 other commenters in the queue, and so I would
16 remind folks just press one then zero on your
17 telephone keypad if you'd like to make a comment.
18 We have none in the queue at the moment, so we
19 will take another short pause. We'll be back
20 every few minutes, and if someone has a comment to
21 make, we'll be back quicker than that.

22 So thanks so much, and we'll be back in

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1 a few minutes.

2 (Break.)

3 MR. GEORGE: And we have another
4 commenter on the line, so, Caller, if you would go
5 ahead, please. And please say and spell your name
6 for us. Go ahead.

7 OPERATOR: You have one question
8 remaining.

9 MS. MURPHY: Kristen Murphy, K-R-I-S-T-
10 E- N, Murphy is M-U-R-P-H-Y. I am, like the other
11 woman who was calling earlier, I am very concerned
12 so much about even the reason why this is being
13 introduced into our agricultural system or why it
14 could be.

15 The cycle of pesticides is something
16 that is so prolific in pesticide use in general,
17 and I myself am at UC Davis in the agricultural
18 institute here, which is the number one actually
19 in the world. And it is known throughout here
20 that we-- that the cycle of pesticides is real,
21 and that with Roundup already having given us
22 super weeds with already more than 21 varieties of

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1 plants that are resistant to it, making the
2 situation worse, which I think is the reason why
3 these seeds are supposed to be helpful, but
4 they're even more poisonous than the Roundup
5 already that we have, which, you know, the concern
6 is that they're just going to make even more
7 plants resistant, so the problem will just
8 continue to worsen and worsen continuously.

9 And I know that the 2, 4-D is both water
10 soluble and can quickly contaminate water, which
11 is such a huge problem already with the other
12 kinds of issues that we put onto our--chemicals
13 that we put onto our agricultural lands, and also
14 probably by air, airborne.

15 And that brings up the problem of
16 putting that onto other agricultural areas,
17 organic or not, people who are not interested in
18 having the 2, 4-D seed ready plants out there.

19 You know, I'm very concerned also that
20 with the amount of travel that 2, 4-D can do, the
21 human health effects. It has been seen to cause
22 lymphoma, which is so serious of a disease, and

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1 these people are ill from it. I know that it
2 causes blindness and ALS. And that a side part of
3 the 2, 4-D are the dioxins, which is, of course,
4 one of the most--one of the worst carcinogens that
5 people have made. And to have that, putting all
6 of that into our food, onto it, to be ready, is
7 absolutely disgusting to me.

8 You know, then I'm very concerned that
9 the only testing that has been done and is being
10 looked at is by Dow itself. I understand that
11 they are a very major and generally well respected
12 agricultural business, but to have only the
13 testing done by them is not actually something
14 that's done in science, right? Like we have peer
15 review for a reason, to make sure that all of
16 these things are going smoothly and accurately and
17 the information is correct. And I really think
18 that more testing needs to be done on it, on the
19 seeds themselves, on what kind of environmental
20 effects that happen when 2, 4-D is released into
21 our environment, especially in such humongous
22 quantities as what will happen once the seed

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1 becomes available for commercial agriculture.

2 Thank you.

3 MR. GEORGE: You're welcome, and thank
4 you for your comment.

5 OPERATOR: You have zero questions
6 remaining.

7 MR. GEORGE: So we have no callers in
8 the queue at the moment. Again, I would invite
9 folks, if you'd like to make a comment, press one
10 then zero. And we have one. So, Caller, if you
11 would remember to say and spell your name for us,
12 and please go ahead with your comment.

13 OPERATOR: You have one question
14 remaining.

15 MR. GEORGE: Hello, Caller. Are you
16 there?

17 (No response.)

18 MR. GEORGE: We're hearing sound but
19 there's no voice. Theresa, it may be that your
20 phone is open?

21 MS. PODOLL: Hi. I'm sorry. I'm on a
22 cell phone, and it's cutting out. I'll try to

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1 call back in. Thank you.

2 MR. GEORGE: Okay. Thank you.

3 OPERATOR: You have zero questions
4 remaining.

5 MR. GEORGE: So we'll pause for a second
6 and give Theresa a chance to call back in.

7 (Pause.)

8 MR. GEORGE: So we're waiting to give
9 Theresa an opportunity to call back. In the
10 meantime we're going to take a brief pause. If we
11 do get her call, or anyone else's for that matter,
12 we will come right back on the line.

13 A reminder, press one then zero on your
14 keypad if you'd like to make a comment. Thanks so
15 much, and we'll be back in a few minutes.

16 (Break.)

17 MR. GEORGE: And we're back at our BRS
18 virtual public meeting, and we do have a caller
19 who would like to make a comment. So, Caller, I
20 would ask you to go ahead and please spell your
21 name for us, if you would, please, at the
22 beginning of your comment.

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1 OPERATOR: You have one question
2 remaining.

3 MR. GEORGE: Caller, are you there?
4 Hello?

5 MS. GRANDIA: Yes, hello.

6 MR. GEORGE: Hello.

7 MS. GRANDIA: Hello. My name is Liza
8 Grandia, L-I-Z-A, G-R-A-N-D-I-A. I am a professor
9 at the University of California, Davis, and among
10 my research areas is the study of trade and
11 pesticides on the farming sector of the Americas.
12 I primarily conduct research in Guatemala, but
13 have been following the trade case surrounding 2,
14 4-D and NAFTA in Canada and now its relationship
15 to this proposal by Dow Chemical to market 2, 4-D-
16 linked soy and corn in the United States.

17 Over the last decade, enough scientific
18 question has been raised about the health impacts
19 of 2, 4-D as an endocrine disrupter, as a
20 potential cause of birth defects, and being deeply
21 implicated and linked with lymphoma. Some two-
22 thirds of Canadian provinces, in fact, have banned

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1 the use of 2, 4-D in residential--as a residential
2 weed killer because of concerns about the health
3 impacts. Studies have shown that homeowners who
4 spray 2, 4-D in their pets have twice the rate of
5 canine cancers than homeowners who let their
6 dandelions grow.

7 Dow challenged that ban in the Canadian
8 courts--a ban, I would note, that was upheld by
9 the Canadian Supreme Court, and having lost that
10 trade suit now is proposing to expand its sales
11 within the United States through these new
12 varietals of 2,
13 4-D.

14 We know a lot about 2, 4-D from the
15 history of Agent Orange, and my question to the
16 USDA and the Environmental Protection Agency is
17 how you are going to link that research from the
18 1970s, '80s, and '90s and this environmental
19 impact, and will we learn from our Canadian
20 neighbors that from the sufficient concern is
21 necessary for us to invoke the precautionary
22 principle and postpone the deregulation of 2, 4-D

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1 until we can further study its impact on health
2 and the environment?

3 Thank you.

4 MR. GEORGE: Thank you for your comment.

5 OPERATOR: You have zero questions
6 remaining.

7 MR. GEORGE: And seeing again that we
8 have no callers in the queue, we will invite those
9 who may care to make a comment to do so by
10 pressing one then zero on your telephone keypad.
11 However, seeing that there are none, we will take,
12 again, a short pause. We will be back in a few
13 minutes. Thanks so much.

14 (Break.)

15 MR. GEORGE: And we're back to receive
16 comments on the draft EIS for corn and soybeans
17 genetically engineered to be resistant to 2, 4-D
18 and other herbicides. If you would like to make a
19 comment, please feel free to do so by pressing one
20 then zero on your telephone keypad. We will be
21 here until 8 o'clock Eastern time, which is 15, 20
22 minutes or so. We welcome your comments. If

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1 you've already commented and would like to say
2 more, you're also welcome to do that. We have
3 time for that as well.

4 So we will--seeing that there are no
5 callers in the queue, we will break away, but
6 we'll be checking back in every few minutes. And
7 if we see a caller who is interested in making a
8 comment, we'll be back pretty quick.

9 So we'll be back in a few minutes.
10 Thanks so much.

11 (Break.)

12 MR. GEORGE: And we have a commenter in
13 the queue who would like to comment, so please go
14 ahead, and if you would, please, remember to say
15 and spell your name for us. Please go ahead.

16 OPERATOR: You have one question
17 remaining.

18 MR. WHITEHURST: Hello. My name is Ron
19 Whitehurst. That's R-O-N, W-H-I-T-E-H-U-R-S-T.
20 I'm a pest control adviser in Ventura, California,
21 working with Rincon-Vitova Insectaries. I help
22 farmers transition from toxic pesticides to

1 biological methods. And as a pest control
2 adviser, I'm really concerned about the increased
3 use of 2, 4-D. It's a really, really bad actor as
4 far as drift and other things. This is probably
5 the worst possible herbicide you could look at as
6 far as engineering into--engineering resistance to
7 it into a plant.

8 The whole idea of genetic engineering is
9 looking at what's on the market as a failed
10 technology. It's bad science based on a static
11 view of the genome, and it's a failed technology
12 as far as the genetically engineered plants
13 developing--not giving farmers a benefit as far as
14 increased yield, increased return on investment,
15 and it doesn't offer anything to the consumer that
16 the consumer does not have an advantage as far as
17 having more herbicides in their food. The
18 herbicide, in fact, glyphosates or Roundup, has
19 been shown to cause tumors in rats, to cause
20 problems as far as the gut lining and imbalances
21 of nutrients. So there's many, many problems with
22 this technology.

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1 Then you're spraying this 2, 4-D out
2 into the environment, which is a known carcinogen,
3 and there's questions as far as its taint in the
4 environment that it may cause, even though the
5 plant is resistant to it, it still has the 2, 4-D
6 in the plant. And so that can cause stress in the
7 plant and possibly induce mineral--nutrient
8 deficiencies in the plant. It may accumulate in
9 certain plant tissues. Certainly it will be
10 present in the corn or soy that's taken in for
11 consumption by humans or animals and cause
12 problems there. Then it will move into the roots
13 and into the soil and be exuded out along with the
14 other things into the root zone, disrupting the
15 microbes living in the soil. And it may make the
16 plant more susceptible to diseases. It may
17 increase the virulence of soil-borne disease
18 organisms. It may be toxic to normal biological
19 control organisms.

20 What is the fate of it as far as the
21 beneficial soil organisms, such as nitrogen-fixing
22 microbes, nitrogen-fixing, free-living algae and

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1 microiatae (phonetic) and earthworms and the other
2 organisms that help to promote plant growth? So
3 there's lots of questions.

4 And then you have the seed, the corn and
5 soy, and the other genetically engineered plants.
6 It's been established through peer-reviewed
7 scientific studies that there's cause for concern
8 with these as food, that they cause problems. In
9 the 15 years that we have had genetically
10 engineered crops in the marketplace, we've seen an
11 increase in our kids of allergies, ADHD, diabetes,
12 obesity, autism, and cancer. This certainly
13 doesn't speak well for that material in the food
14 supply.

15 So we need to stop this craziness. We
16 need to not release--or deregulate this material.
17 We need to have--take another direction into a
18 more sustainable and life-supporting technology
19 that doesn't have all of these myriad downfalls
20 and problems for the rest of society and the rest
21 of the environment.

22 Thank you.

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1 MR. GEORGE: Thank you for your comment.

2 And we have another caller in the queue.

3 If you would please go ahead, and remember to say
4 and spell your name for us, please.

5 OPERATOR: You have one question
6 remaining.

7 MR. PALMER: My name is Damon Palmer, D-
8 A- M-O-N, P-A-L-M-E-R. I'm the U.S. commercial
9 leader for Enlist products at Dow AgroSciences in
10 Indianapolis, Indiana. I appreciate this
11 opportunity to publicly comment in support of
12 Enlist, which will help American farmers solve the
13 tremendous challenge they're facing to control
14 resistant weeds.

15 Problematic weeds are now affecting 86
16 percent of corn and soybean growers in the South
17 and 61 percent in the Midwest. Resistant and
18 hard- to-control weeds more than doubled from 2009
19 and affect an estimated 70 million acres. Those
20 are staggering numbers and illustrate the
21 significant, urgent need for Enlist corn and
22 soybeans.

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1 Wheat scientists are in universal accord
2 that using herbicides with multiple modes of
3 action is a key weapon in fighting weed
4 resistance, and Enlist crops have been
5 specifically designed for this purpose. As time
6 passes, without new technology to address this
7 problem, resistant weeds continue to proliferate
8 and spread as an impact beyond the farm.
9 Environmental gains made through conservation
10 tillage, economical food prices, global
11 competitiveness are the very viability of some of
12 our American farmers' operations, and those are at
13 stake.

14 Timely approvals of Enlist corn and
15 soybeans can help mitigate those impacts. Dow
16 AgroSciences appreciates the significant effort
17 from USDA to produce an extensive draft EIS
18 document. The DEIS not only includes a thorough
19 environmental evaluation of Enlist corn and
20 soybean traits. It also considers existing
21 farming practices and several potential
22 alternatives. USDA's preferred alternative to

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1 deregulate Enlist corn and soybean crops is a
2 positive indication for farmers.

3 The addition of 2, 4-D tolerance to a
4 farmer's toolkit will dramatically impact his or
5 her ability to control resistant weeds. 2, 4-D
6 has been in use since the 1940s and is an
7 effective crop protection tool. USDA recognized
8 in the DEIS that 2, 4-D is a widely used herbicide
9 with an extensive history of safe and effective
10 use and that it has been thoroughly reviewed and
11 re- registered by all major regulatory agencies in
12 the world within the last 10 years.

13 Dow AgroSciences has worked with
14 stakeholders across the agricultural and academic
15 community to design a product that is not only
16 effective for corn and soybean growers, but also
17 compatible with neighboring systems, including
18 specialty and organic crops. That dialogue
19 resulted in product enhancement and effected the
20 development of a stewardship program for
21 responsible use.

22 Growers who plant Enlist crops will use

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1 a safer and more environmentally friendly method
2 of production. As USDA recognized in its draft
3 EIS, the 2, 4-D choline to be used on Enlist crops
4 is significantly less volatile than current forms
5 of 2, 4-D, reducing the potential for off-target
6 movement. Similarly, the proprietary herbicide
7 formulation used on Enlist crops will reduce
8 drift. And as USDA also stated, Enlist crops will
9 help farmers manage glyphosate-resistant weeds
10 without having to return to aggressive tillage
11 practices which would adversely impact soil, air,
12 and water quality.

13 The USDA has conducted very extensive
14 reviews of the Enlist traits through a previous
15 environmental assessment and now with this draft
16 EIS. The data package that supports Enlist
17 contains the latest and best science on the traits
18 and the chemistry.

19 In addition, the Enlist technology has
20 been reviewed and approved by respected regulatory
21 agencies around the world, including Canada and
22 Japan.

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1 Again, Dow AgroSciences appreciates the
2 USDA's extensive draft EIS and strongly encourages
3 USDA to finalize its review and deregulate the
4 technology so that American farmers can access
5 Enlist corn and soybeans in 2015. The most
6 important thing we can do is provide technology
7 farmers need to raise healthy crops, put food on
8 our tables, and steward their land for generations
9 to come. Enlist can help get us there.

10 MR. GEORGE: Thank you for your comment.

11 And we have another caller ready to
12 comment. If you would go ahead, please, and say
13 and spell your name.

14 OPERATOR: You have two questions
15 remaining.

16 MS. DIETRICK: My name is Jan Dietrick,
17 J- A-N, D-I-E-T-R-I-C-K. I am a former registered
18 dietician and now work with the Dietrick Institute
19 for Applied Insect Ecology. I have a master's
20 degree in public health and a strong interest in
21 food safety. I am in Ventura, California.

22 It has been said and quite well known

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1 the studies linking 2, 4-D to cancer, low sperm
2 counts, liver disease, Parkinson's disease, birth
3 defects, and adverse effects on hormones,
4 reproduction, and the nervous system and the
5 endocrine systems. These impacts need to be
6 reviewed for those organisms that could be
7 affected by drift and runoff as well as by those
8 eating the food that has been treated, and this is
9 a different type of treatment than 2, 4-D has been
10 used for over the decades, because this is
11 repeated and broad scale and in combination, as I
12 understand, and stack genetics with Roundup
13 resistance. So what is the impact of drenching
14 these plants with both herbicides?

15 Apparently Dow has fixed this chemical
16 that is notorious for crop injury incidents from
17 drift, but there is still inevitable damage to
18 borders and surrounding farmscape and habitats
19 that are part of sustainable and biological
20 farming. It needs to be determined that there's
21 no chance of herbicide being carried, even on
22 water vapor blown by the wind, as has happened

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1 with other aerial pesticides. Reducing the
2 potential for drift, unquote, is simply not
3 enough.

4 When the technology of herbicide
5 resistance has failed in the case of Roundup, why
6 would our government support a repeat of the same
7 failure with other herbicides? An earlier
8 commenter said he used 2, 4-D for many years, so,
9 you know, does he want to ruin 2, 4-D for the
10 purposes that he used to use it? Dow and the
11 farmers who use GE crops know that deregulating
12 will lead to greater use of this and other toxic
13 chemicals and increase weed resistance. This is
14 just about money for Dow, it looks to me.

15 Besides health impacts on animals and
16 humans, impacts on the health of the actual crop
17 plants, which there is a new study showing
18 significant differences in the nutritional quality
19 of the Roundup Ready soybeans, all this needs to
20 be studied. We want to know that there's no
21 substantial difference in the nutritional quality
22 of the corn, and including the toxics, we want to

1 know the levels in the food. We want to see data
2 that have characterized the transgenes over a
3 period of years because we understand that they
4 move. A review of all approved crops in the EU
5 shows that in every single one approved, the
6 transgene had been rearranged, and either within
7 the genome and in one study there's a 30-percent
8 chance of--greater chance of the transgene
9 escaping its host genome and spreading to
10 neighboring plants.

11 We need more evidence that these GE
12 crops are stable; otherwise, they are already
13 immediately and from the very get-go in violation
14 of EPA regulations in that they are substantially
15 not equivalent, and even to each other over time,
16 much less to their natural non-engineered
17 counterparts. We want the health risks to be
18 assessed.

19 Of course, as I started out my comment,
20 there are so many health risks, and yet if the
21 transgene is unstable, then even a health risk
22 assessment seems like an absurd exercise. It's

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1 just time to move on to biological, natural,
2 sustainable methods for weed control. Let's have
3 our USDA put its attention on non-toxic weed
4 management.

5 In summary, Roundup is bad enough. 2,
6 4-D is worse, and the entire process of inserting
7 foreign traits into genomes has serious problems
8 that have not been adequately studied.

9 And then, finally, I would say that
10 scientists all over the world have reported in the
11 ISTAD report and in the 2013 review of the UN
12 Convention on Trade and Development that
13 industrial agriculture using biotechnology is
14 getting in the way of the development of
15 appropriate organic and sustainable methods that
16 are definitely proven superior for food security
17 and a warming climate.

18 Thank you very much.

19 MR. GEORGE: Thank you. Thank you for
20 your comment.

21 And I think we have two other commenters
22 from the line, and that will be it for tonight.

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1 We will take these last two comments. So, Caller,
2 if you could go ahead and say and spell your name,
3 please?

4 Caller, are you there? Hello?

5 Do you have a comment to make, please?

6 (Pause.)

7 MR. GEORGE: Seeing that we have no
8 comment, I think we will bring our meeting to a
9 close. I will thank everyone who has participated
10 in tonight's meeting. We're very glad to have
11 your input. Thank you for joining our virtual
12 public meeting.

13 I will also remind folks that if you
14 would like to make a written comment, you can do
15 so by going to www.regulations.gov. You can leave
16 a written comment there up through February 24th,
17 and we'll be glad to have it. You would put
18 APHIS- 2013-0042 in the (phone interruption) box.

19 Also, I will remind you that the
20 PowerPoint presentation tonight and a lot of other
21 documents and background concerning this subject
22 are at the website, which is www.aphis.usda.gov/

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1 aphisvirtualmeeting. And I would invite you to go
2 there to get more information.

3 Also, there's a survey there at that
4 website. Those of you that have been on the line
5 who have commented and also those who have been
6 listening, we would welcome your input as to how
7 effective this meeting was, any difficulties you
8 had logging on, and so forth. So if you would
9 take a few minutes to take the survey at that
10 site, we would be most appreciative.

11 So at this time, again, our thanks to
12 you all for joining us, and we'll be taking this
13 meeting to a close.

14 Thanks so much and good night.

15 (Whereupon, at 8:05 p.m., the virtual
16 meeting was adjourned.)

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1 CERTIFICATE OF TRANSCRIPTION

2

3 I, CHRISTINE ALLEN, hereby certify that I am
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5 and that I have typed the transcript of the proceeding
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