



Pollinator Stewardship Council

P.O. Box 304, Perkinston, MS 39573

www.pollinatorstewardship.org

832-727-9492

Oct. 8, 2014

Sid Abel
Biotechnology Regulatory Services
4700 River Road
USDA, APHIS
Riverdale, MD 20737

Re: Docket APHIS-2013-0043-0067

Monsanto Petitions (10-188-01p and 12-185-01p) for Determinations of Nonregulated Status for Dicamba-Resistant Soybean and Cotton Varieties--Draft Environmental Impact Statement – 2014

Dear Mr. Abel,

We acknowledge APHIS does not regulate the label defining use guidelines. We realize this petition to APHIS by the registrant is simply to seek non-regulated status of the genetically modified cotton and soybean seeds. We realize APHIS is constrained by narrowly defined strictures which allows the various regulatory entities to examine one small aspect of a product released into the ecosystem, and absolve itself of the impact to the environment as a whole. That being said, APHIS has appeared to have made their determination with “Alternative 2: Determination of Nonregulated Status of MON 87708 Soybean and MON 88701 Cotton (Preferred Alternative).” Your decision continues to represent the weak risk assessment process of the regulatory agencies, as your agency is only concerned with plant pest risks. **The unrealistic cost-benefit risk assessment of this process has led to the creation of Glyphosate Resistent (GR) weeds, increased herbicide use, and non-target exposures carried on the wind, through the soil, and water to non-target organisms. However as you clearly state, your analysis is restricted to the plant pest risk. You do define in your own DEIS this genetically engineered (GE) product will not reduce chemical dependency of growers, it will not reduce the use of glyphosate, and may increase the use of dicamba.**

The Pollinator Stewardship Council’s mission is to defend managed and native pollinators vital to a sustainable and affordable food supply from the adverse impact of pesticides.

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“The availability of dicamba-resistant soybean and cotton in conjunction with EPA approval of new uses of dicamba on these new varieties would cause growers who adopt the varieties to change management practices. For instance, dicamba use may increase to levels greater than what might occur if these varieties were not available. Another anticipated change is that dicamba is expected to be used over a wider part of the growing season. Both changes in management practices can be expected to increase the pressure for selection of dicamba-resistant weeds.”

“Growers will likely continue to use glyphosate because it is still effective on hundreds of weed species. However, farmers are also expected to depend on additional chemical and non-chemical methods to control GR weeds.”

“Over the long term, as weeds develop resistance to dicamba or glufosinate, multiple resistance to these compounds and glyphosate, will likely reduce the efficiency of weed control. This will tend to increase weed management costs. Some growers may need to use more aggressive tillage to control resistant weeds. Adoption of conventional tillage would be expected to result in greater soil erosion, loss of organic matter, soil compaction, and reduced moisture holding capacity, as compared to conservation or reduced tillage methods. This would lead to an increase in potential sedimentation and turbidity in nearby surface waters during rain and irrigation events and adverse impacts to biological resources. Non-adopters and growers of non-GE crops will again be impacted by weeds from neighboring farms. Growers of small cereal crops will experience greater weed control costs as alternatives to these herbicides are likely to be more costly.”

But again, we realize “APHIS analyzes the data from the petitioner, researches current scientific findings, and prepares a Plant Pest Risk Assessment (PPRA) that documents whether or not the GE organism is likely to cause disease or damage.” And yet, you clearly state, “The availability of inexpensive and effective herbicides may delay the adoption of non-chemical management strategies under the Preferred Alternative. . . . and “in some studies it has also been observed that, depending on factors such as weed species, environmental conditions (i.e., rainfall amounts) and soybean cultivar, soybeans are able to compete with weeds with no resulting yield reduction (Krausz *et al.*, 2001).”

APHIS acknowledges the holistic view of the ecosystem; and yet, promotes the “preferred alternative” to grant non-regulated status, knowing full-well it is problematic.

You acknowledge “Insects and other invertebrates can be beneficial to soybean and cotton production, providing services such as nutrient cycling and preying on plant pests.” Yet, the increased use of dicamba and other herbicides will severely impact beneficial insects. The increased use of dicamba and other herbicides will travel off-site harming neighboring crops, and pollinator habitat. The increased herbicide use contradicts an Integrated Pest Management program. Damaging CRP lands with volatilized dicamba will waste tax payer funding used to increase pollinator habitat as part of the USDA and Presidential initiatives. The continued chemical dependency contradicts the original rational of GE seeds: to use less field applied chemicals.

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We urge APHIS to continue to regulate MON 87708 Soybean and MON 88701 Cotton.

Formally,

Michele Colopy
Program Director

Field Case Studies of Dicamba Movement to Soybeans

<http://www.soils.wisc.edu/extension/wcmc/2004proceedings/Boerboom3.pdf>

Dicamba Volatility

<http://www.weeds.iastate.edu/mgmt/2001/dicambavolatility.htm>

Dicamba Technical Fact Sheet

http://npic.orst.edu/factsheets/dicamba_tech.pdf

Dicamba

<http://pmep.cce.cornell.edu/profiles/extoxnet/carbaryl-dicrotophos/dicamba-ext.html>

New studies emphasize herbicide effects on wild plants

<https://www.certifiedcropadviser.org/science-news/new-studies-emphasize-herbicide-effects-wild-plants>

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