

BASF's Position on Use of Glyphosate on LibertyLink GT27 & GT27 Soybeans

LibertyLink® GT27™ is the first soybean technology with herbicide tolerance to both Liberty® herbicide and glyphosate. This system provides growers with even greater flexibility and choices in their weed management programs. LibertyLink GT27 and GT27 soybeans tolerate the use of glyphosate like any other glyphosate-tolerant crop.

Prior to its recent sale of assets to BASF, Bayer tested glyphosate use on LibertyLink GT27 extensively to include GlyStar® Plus, Cornerstone® Plus, Glyphos® X-TRA, Touchdown Total®, Durango®, Honcho® Plus, Roundup® PowerMAX®, Roundup WeatherMAX®, and Roundup Original Max®. The results were clear that LibertyLink GT27 has commercially acceptable tolerance to glyphosate.

Additionally, Bayer submitted residue data for post-emergence use of glyphosate on LibertyLink GT27 and GT27 soybeans to the Environment Protection Agency (EPA) as part of the data submission in support of the registration for use on soybeans. GT27 is the event that includes a patented glyphosate tolerant gene. LibertyLink GT27 is a stack of GT27 and the LibertyLink (glufosinate tolerant) event LL55. Both GT27 and LibertyLink GT27 are glyphosate tolerant.

Labels have evolved over time, dating back to language used when Roundup was the only glyphosate product and Roundup Ready branded crops were the only glyphosate tolerant crops on the market, to the current day where there are many glyphosate herbicide product labels and several traits that provide glyphosate tolerance.

- BASF's position is that several glyphosate brands can be applied on LibertyLink GT27 and GT27, including Makaze® L, Cornerstone®, Mad Dog® 5.4, Honcho® 4L, Abundit® Edge, Glystar® Plus, Glystar® Original, and Glystar® K-Plus. We have had conversations with glyphosate suppliers that there is adequate supply to address the significant launch of LibertyLink GT27.
- The Durango DMA® label was recently amended by its registrant to ensure it can be applied on all glyphosate tolerant soybeans. https://www3.epa.gov/pesticides/chem_search/ppls/062719-00556-20190306.pdf
- Additionally, it is BASF's position is that Roundup WeatherMAX and Roundup PowerMAX can be used on LibertyLink GT27.
- On many of the labels, Roundup Ready crops are defined as crops that contain a glyphosate tolerance gene. The Roundup PowerMAX and Roundup WeatherMAX labels (https://www3.epa.gov/pesticides/chem_search/ppls/000524-00549-20110215.pdf and https://www3.epa.gov/pesticides/chem_search/ppls/000524-00537-20110329.pdf) define Roundup Ready Crops to include those containing a "patented gene that provides tolerance to glyphosate". This is not restricted to a particular glyphosate tolerant gene. LibertyLink GT27 and GT27 soybeans, as well as Agrisure® GT (GA21) corn and Enlist E3™ soybeans, contain a glyphosate tolerant gene. As such the definition includes not only Roundup Ready branded crops but also these other crops not branded as Roundup Ready.
- Related glyphosate label inconsistencies may not have been an issue years ago, when only one glyphosate tolerant gene was in commerce, but now they must be acknowledged and their application to a broader range of products than only branded Roundup Ready crops accepted.
- Bayer has been quoted saying, *"The only type of crop currently labeled on the Roundup brand agricultural herbicides labels for over the top usage are Roundup Ready crops."** And yet, Agrisure GT corn has been on the market for over a decade; since 2010, over 19.4M acres of Agrisure GT corn have been sprayed with a Roundup branded glyphosate, and in 2018 over 40% of Agrisure acres treated post emergent with glyphosate were sprayed with Roundup branded glyphosate. In practice, this corn has been treated as a Roundup Ready Crop as defined on the label. To the best of our knowledge, Bayer has not actively participated in a stewardship campaign to address the use of Roundup formulations on crops not labeled as Roundup Ready (e.g. Agrisure GT). Our

expectation is that the same interpretation should be applied to new products such as LibertyLink GT27.

BASF is committed to helping growers solve the problems they face in the field. From weed control to solutions needed to combat weed resistance, BASF believes more innovation and more choices for growers is vital.

Growers should have access to all approved trait events and have freedom to use their EPA-registered product of choice over the top of LibertyLink GT27 and GT27 soybeans. Restricting the use of glyphosate limits the full potential of new technologies, and new technologies are needed to address growers' weed control needs as well as deliver genetic diversity. Diversity of solutions and more choices is a more sustainable approach to weed control and resistance.

One seed technology will not solve all the challenges growers face throughout the growing season. Growers need clear guidance, not confusion regarding the critical tools they need to fight weeds. Let's work together to find a solution that meets the needs of growers.

We are working diligently with the EPA and the rest of the industry to resolve any points of confusion and provide full clarity to farmers.

*Source: MCPR Enews_March 11, 2019

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