Dicamba

Frequently Asked Questions

This FAQ document will attempt to highlight the specific changes but as always, read the product label before application.

Registration

1. What is the current registration status of these products?

On June 8, 2020 the Environmental Protection Agency (EPA) released a cancellation order in response to a June 3, 2020 federal appeals court decision to remove the registration for certain dicamba-containing herbicides. The order stated that distribution or sale of these chemicals by any person is generally prohibited, except for the purpose of ensuring proper disposal or return to the registrant. Growers and commercial applicators could have used existing stock that was in their possession as of June 3, 2020, the effective date of the court decision. Such use had to be consistent with the product's previously-approved label, and could not continue after July 31, 2020. This cancellation order affected the products XtendiMax with VaporGrip Technology, Engenia and FeXapan with VaporGrip Technology. The registration of Tavium Plus VaporGrip Technology was not affected by the cancellation order.

On October 27, 2020 the EPA announced the approval of a new five-year registration for Engenia and XtendiMax with VaporGrip Technology and that they extended the registration of Tavium Plus VaporGrip Technology which had an expiration date of December 20, 2020. These new registrations will expire December 20, 2025. FeXapan with VaporGrip Technology was not renewed. The new five-year registration for Engenia and XtendiMax with VaporGrip Technology and the extended registration of Tavium Plus VaporGrip Technology are amended labels to the previously-approved label. These three products are currently registered for sale and use in the State of Wisconsin.

Training

2. Who needs mandatory dicamba training?

Individuals using these dicamba products:

- Engenia (EPA Registration number 7969-472, BASF is the registrant)
- XtendiMax with VaporGrip Technology (EPA Registration number 264-1210, Bayer is the registrant)
- Tavium Plus VaporGrip Technology (EPA Registration number 100-1623, Syngenta is the registrant)

These products are Restricted Use Pesticides and can only be purchased and used by certified applicators (private applicators and commercial applicators). Prior to applying or using any of these three dicamba products, the applicator must become certified **and** complete dicamba training. This training requirement applies to applications made to soybeans and to applications on any other crops listed on these product labels. Required dicamba specific training can be found at the following websites:

- https://www.engeniastewardship.com/#/
- https://www.roundupreadyxtend.com/stewardship/Pages/default.aspx
- https://www.syngenta-us.com/herbicides/tavium-application-stewardship

IMPORTANT: Only these three dicamba products are approved for post-emergent use on dicamba-tolerant soybeans in Wisconsin. Using other dicamba products is illegal.

3. Do mixers, loaders, handlers, and spray equipment cleaners need training?

Yes, people responsible for any part of the application process which includes mixing, loading, application, or cleaning dicamba application equipment must attend the training. The training is required whether you are a certified applicator or not. Workers that only transport unopened dicamba containers are not required to be trained.

4. Do individuals who mix/load XtendiMax, Engenia or Tavium need to be a certified pesticide applicator?

To find products that kill coronavirus, visit Individuals that mix and load these dicamba pesticides must be a certified pesticide applicator. People certified as a mixer/loader in WI category 24.0 can NOT MIX/LOAD these dicamba pesticides because they are not certified applicators as per ATCP 29.28, the label language in effect requires anyone handling the product to be a certified applicator.

5. Do I need to complete the label mandated training before I purchase these products?

No, certified applicators (both private and commercial) do not need to complete the label training to purchase the products, but must complete the training before applying the products. Pesticide dealers are not required to see the proof of training prior to selling the product to certified applicators.

6. Who can provide dicamba training?

The respective registrants offer online training which can be found at:

- https://www.engeniastewardship.com/#/
- https://www.roundupreadyxtend.com/stewardship/Pages/default.aspx
- https://www.syngenta-us.com/herbicides/tavium-application-stewardship

From these websites you can find out more information on potential in-person dicamba training events offered by the registrants. You will need to keep a copy of your completion certification from the training you attend.

7. Will dicamba training from another state count as dicamba training in Wisconsin?

Yes, a dicamba training specific to these three products offered by another state is acceptable. You will need to keep a copy of your completion certification from the training you attend.

8. Is training one-time or do I need training every year?

Dicamba training is required annually. Even if you received mandatory dicamba training last year, you must complete training each year prior to applying the product.

9. Will my applicator certification or license be amended to show that I've received training?

No. You are responsible for retaining your training information. Pesticide dealers are not required to see the proof of training prior to selling the product to certified applicators. Proof of training is required for completing your application records.

Record Keeping

10. Am I required to document application parameters and conditions beyond keeping a record, as required by the label and Wis ATCP 29 Adm Code?

No, legally you are only required to keep a record to document required elements like application start and end times, temperatures, wind speeds, wind directions, nozzles, boom height, ground speed, etc. If DATCP investigates a complaint involving your application, we will ask for a copy of your complete application records, and will verify the accuracy, including but not limited to, wind speeds and directions. If you choose to support your records with such things as time and date stamped photographs of weather recording instruments at boom height, those supplemental materials will be considered during the investigation.

11. Will DATCP check my records?

DATCP has the authority, under ATCP 29.33, to inspect your records of pesticide purchases, applications, and as part of any dicamba application of these products, the proof of training record. DATCP routinely inspects RUP sales and application records for compliance.

12. Have the dicamba record keeping requirements changed for 2021?

Yes, in 2021, records must also now include the mandatory volatility and/or drift reduction agent(s) used and the spray system cleanout. At a minimum for documenting spray system cleanout, records must include the confirmation that the spray system was clean before using the product and that the post-application cleanout was completed. Review the label for the specific product you intend to apply for more details on dicamba record keeping requirements. Wisconsin law requires that you complete your records on the day of application and keep them for 2 years from the date of application.

13. The product labels require that I keep a record of when I checked a sensitive crop/specialty crop registry for the presence of nearby sensitive crops or sites. Can I also use that site to check for the presence of nearby non-DT soybeans?

In 2021, the location of row crops like non-DT soybeans cannot be mapped in DriftWatch in Wisconsin. Access CropCheck through www.driftwatch.org. Please keep in mind that DriftWatch is not a regulated/required site by DATCP. This site is merely a tool to help applicators. Growers are not required to enter their specialty crops onto DriftWatch.

Restrictions

14. Are there any application timing restrictions on the use of these products?

Yes, these products may be applied pre-plant, at-planting, pre-emergence, and post-emergence (in crop) in dicamba-tolerant soybeans. Applications can only be made from one hour after sunrise until 2 hours before sunset. Additionally, no applications are permitted at night.

XtendiMax with VaporGrip Technology timing on soybeans: up to and including June 30. Applications occurring after R1 are prohibited as crop response may occur and in no event can applications be made after June 30 regardless of growth stage.

Engenia timing on soybeans: may only occur through June 30. DO NOT apply after June 30.

Tavium Plus VaporGrip Technology timing on soybeans: through V4 or prior to June 30, whichever comes first.

Buffer

15. The 2021 labels still have mandatory buffer requirements. Non-sensitive crops and areas are important because they are acceptable for use as part of the calculation for the out-of-field buffer area. What are non-sensitive crops and areas?

Non-sensitive crops and areas include paved or gravel surfaces; roads; mowed and/or managed areas adjacent to fields, such as roadside rights-of-way; areas of bare ground from recent plowing or grading that are contiguous with the treated field; areas covered by the footprint of a building, silo, shade house, feed crib, or other manmade structure with walls and a roof; agricultural fields that have been prepared for planting; and planted agricultural fields containing asparagus, corn, dicamba-tolerant soybeans, sorghum, proso millet, and small grains (the applicator is responsible for ensuring that the crops are dicamba-tolerant).

16. Are there still prohibitions against spraying when wind is blowing toward sensitive crops and plants?

Yes, the 2021 XtendiMax label states, “DO NOT SPRAY this product when wind is blowing toward adjacent sensitive crops and certain plants.” The 2021 label for Tavium states, “DO NOT APPLY this product when the wind is blowing toward adjacent non-dicamba-tolerant sensitive crops and/or plants.” The 2021 Engenia label states, “DO NOT apply when wind is blowing in the direction of adjacent sensitive crops or residential areas.” Although the Engenia label specifies the need to protect residential areas while the XtendiMax and Tavium labels do not, the label-posted list of sensitive crops subject to this wind direction application restriction includes the catchall term “other broadleaf plants.” Therefore, these protections must be applied to both sensitive plants and crops on both agricultural and residential properties. The downwind application prohibition applies to both.

17. Are the 2021 buffer requirements the same as on the 2020 labels?

No, there are several significant changes. First, applicators must always maintain a 240 foot buffer when applying these products from the downwind outer edges of the field. Only when using an approved hooded spray boom, listed on the appropriate dicamba product website, the required downwind buffer may be reduced to 110 feet. Second, in 2021, both a 310-foot in-field wind-directional spray drift buffer and a 57-foot omnidirectional in-field buffer are required in counties where dicamba sensitive endangered species are present.

18. Where can I find which counties for Wisconsin have dicamba-sensitive endangered species present that the 310-foot wind-directional and 57 foot omnidirectional buffer is enforced?

In certain counties where threatened and endangered species may be present, you must provide both a 310-foot in-field wind-directional spray drift buffer and a 57-foot omnidirectional in-field buffer. Before using any of these products, you must consult an endangered species bulletin for the month you plan to apply. The bulletins are available at http://www.epa.gov/espp/ or by calling 1-844-447-3813.

As of December of 2020 restrictions are in place for the following counties in Wisconsin: Adams, Barron, Chippewa, Clark, Columbia, Dane, Dunn, Eau Claire, Grant, Green, Green Lake, Jackson, Juneau, Manitowoc, Marquette, Monroe, Oconto, Pierce, Portage, Richland, Rock, Sauk, Shawano, Sheboygan, St. Croix, Vernon, Waupaca, Wood.

As this information may change over time, applicators will need to consult the Bulletins website (listed above) to obtain the Bulletin valid for the month in which you will apply the product.

19. What is an example of a field that is required to include a 310-foot wind-directional and 57-foot omnidirectional in-field buffer as required in certain counties under an endangered species product bulletin?

20. Are the sizes of the downwind buffers the same in 2021 as they were in 2020?

No, new in 2021, the applicator must always maintain a 240-foot downwind buffer between the last treated row and nearest downwind field/area edge (in the direction the wind is blowing). Applicators can still use out-of-field non-sensitive crops and areas in the total buffer distance calculation. Only when using a qualified hooded/shielded sprayer, the applicator may maintain a minimum 110-foot downwind buffer. Qualified hooded/shielded sprayers are listed on the appropriate product's website.

21. Is a buffer required on just one downwind side of a dicamba-treated field?

Sometimes yes, but often times downwind buffers are required on several sides. Applicators should remember that buffers will often be required on two or more downwind sides of a target field if wind direction is not constant and non-target sites are not positioned completely perpendicular to one another. A 45-degree wind direction would require a buffer on two downwind sides.

22. If I own a wooded lot downwind of my target field, do I need a downwind buffer?

Yes, regardless of who owns the wooded lot, it is label-defined as a sensitive uncultivated area that may harbor a sensitive plant species. Therefore, even an adjacent wooded lot that you own or control is required to have a downwind spray buffer.

Temperature Inversion

23. These dicamba labels prohibit application during a temperature inversion. How can I determine if a temperature inversion exists in or near my target field prior to application?

Just like other weather measurements, there is no one official method to determine if temperature inversion conditions exist in a field. However, temperature inversion indicators can include nights with limited cloud cover and light-to-no wind, ground fog, smoke not rising, dust hanging over a road, or the presence of dew or frost. Just like other weather data documentation, a time, date, and GPS-stamped photograph taken in the field from your smartphone can serve to supplement and support your determination that an inversion did not exist, if DATCP is requested to investigate. In addition, tools to help you identify the likelihood of a temperature inversion can include smoke bombs/grenades in the target field, phone apps like the Pocket Spray SmartTM and RRXtend Spray App, and Inversion Tester by Spoton®. (PLEASE NOTE THAT MENTION OF ANY SPECIFIC EQUIPMENT OR DATA SOURCE IN THIS DOCUMENT DOES NOT SUGGEST ENDORSEMENT OR APPROVAL BY DATCP.)

Sensitive/Susceptible Crops

24. Is there a list of sensitive crops and plants?

Yes, the labels provide a partial list of these crops and plants. Sensitive plants include, but are not limited to: plants in both agricultural and residential areas such as non-DT soybeans and cotton, cucumber and melons (EPA crop group 9), flowers,

fruit trees, grapes, ornamentals including greenhouse-grown and shade house-grown broadleaf plants, peanuts, peas and beans (EPA crop group 8), peppers, tomatoes, and other fruiting vegetables, potato, sweet potato, tobacco, other broadleaf plants, and including plants in a greenhouse.

25. Do sensitive crops include adjacent or neighboring organic crops?

Yes, although certified organic crops are not listed on the label as an example of a sensitive crop, the fact remains that any pesticide residues in these crops, whether damaging or not, might make these crops unfit for sale, use, or consumption as organic. Therefore, certified organics are sensitive crops.

26. I have seen the term sensitive areas on these labels. What are sensitive areas?

Sensitive areas are different from sensitive crops or sensitive residential areas. Sensitive areas include bodies of water and nonresidential, uncultivated areas that may harbor sensitive plant species. Sensitive areas also include endangered species protection areas. Applicators are required to consult http://www.epa.gov/espp/ to determine if they intend to apply in a county with dicamba-sensitive endangered species.

Tank Mix

27. I have a spray injection system that allows me to keep dicamba and other on-sprayer herbicides and adjuvants in separate tanks. The point of injection for each tank is at the spray boom. Can I use the same spray system for dicamba and other herbicides or adjuvants if those other products are not on the list of label-approved tank mixes?

No, you can't use the injection spray system to circumvent the tank mix restrictions. Even very small amounts of dicamba left in spraying systems have caused significant cross contamination and non-target impact issues.

28. What is a VRA or DRA and do they need to be included in the tank mix?

documenting weather conditions in the field at the time of application. Wind and temperature can be measured with hand-held devices that have beencalibrated (tested) to ensure their accuracy. Document your measurements on your dicamba-specific pesticide application record. Although not required, written records can be made more

VRA stands for Volatility Reduction Adjuvant and DRA stands for Drift Reduction Adjuvant. New for 2021, applications of Tavium Plus VaporGrip Technology or Xtendimax with VaporGrip Technology require the inclusion of a volatility reduction agent (VRA and may also be referred to as a buffering agent/pH modifier) AND a drift reduction agent (DRA) unless otherwise indicated on the appropriate product website for approved tank mix partners. Applications of Engenia require the inclusion of a volatility reduction agent. The applicator must check the website for a list of approved tank mix products no more than 7 days before application. The applicator must also keep a record of the VRA/DRA product(s) used.

29. Is there any guidance on what to do or not do with these dicamba products that have been mixed for application but then the weather changes abruptly, preventing legal application?

You may be able to store a mixed load for 24-48 hrs without any problems provided you agitate it every 4 to 8 hours. Don't add a water conditioner unless an approved product is on the label. If you need to spray elsewhere, store the dicamba as a hot load (pump it into a storage tank, labeled appropriately) and clean out the sprayer before spraying a sensitive crop with a different product. If weeds get to be bigger than 4 inches, make sure all your sprayer application parameters are on label to give the herbicide the best chance to work and don't expect 100% control. The pesticide label is the law. Follow label directions for storing a mixed load and/or contact the pesticide registrant to receive directions.

Weather-Measurement Equipment

30. What weather measurement methods and equipment are acceptable for meeting the label requirements for measuring boom-height temperature, wind speed, and wind direction, both at the start and the end of each application?

There is currently no official or authorized equipment, method, or data source for taking and supportable by taking a legible time and date stamped photograph of the measurement device and readings in use in the field. Most photographs taken with smart phones can provide a record of time, date, and GPS coordinates. When DATCP investigates an off-target movement complaint, we will utilize the most credible weather data available.

Pesticide Dealer

31. Is a pesticide dealer license needed to sell or offer to sell the new dicamba products?

Yes, the dicamba products are classified as RUPs. DATCP issues Restricted Use Pesticide Dealer/Distributor Licenses to businesses that offer for sale or sell RUPs to an end-user for use in the state of Wisconsin.

32. What are a pesticide dealer's responsibilities for selling or offering the new dicamba products for sale?

Pesticide dealers may only offer for sale or sell these products to persons that hold a valid Commercial or Private Applicator certification or to a licensed pesticide application business. Dealers must keep records of their purchase, sale, and distribution of these products for two years.

Rain

33. What is the requirement for applying one of the RUP dicamba products followed by irrigation or predicted rain?

The labels prohibit application if rainfall is predicted within 48 hours. Rainfall and irrigation are essentially considered the same, so irrigation should not occur until 48 hours after the application. The intent is to avoid runoff of the chemical that could result in uptake by non-target species.

Tank Cleanout

34. Must I cleanout my spray equipment every day when using the RUP dicamba products?

No. The labels require specific procedures for cleaning the spray system before using the RUP dicamba after another type of spray mix, and immediately after using dicamba before switching tank mixes. This is to avoid contaminating the RUP dicamba spray mix with other chemicals that might affect the volatility of dicamba, and to avoid carrying dicamba over to a sensitive crop in the next load or applications. RUP dicamba labels require applicators to ensure that spray equipment is clean before using the product and after the product is applied. Cleaning equipment prior to loading with dicamba assures that nothing left in the sprayer will negatively impact the performance of the dicamba or the crop being treated. Note: DATCP also advises applicators that all transportation equipment hauling pre-blended dicamba loads to the field are also potential sources of contamination and should be treated the same as spray equipment when it comes to cleaning before changing product mixes.

35. How should I record how and when the spray system cleanout was done when using the same RUP dicamba product for multiple loads and/or over several days?

The RUP dicamba labels require you to record how and when the equipment was cleaned, every time you clean it. At minimum, the spray system must be cleaned before the first load of RUP dicamba is applied and after the last continuous RUP dicamba application is completed. Equipment does not need to be cleaned after every application or every load IF your spray mixes are identical and are all made with allowed tank mix partners/products applied to the treated soybeans. In that case, you could document cleanout dates and procedures of the first and last applications, and include all required pesticide application records for fields sprayed in between.

Sources

- Dicamba FAQs. (2018). Retrieved April 03, 2018, from http://mda.state.mn.us/chemicals/pesticides/dicamba/dicambafaq.aspx
- Dicamba Use & Mandatory Training in INDIANA. (2018). Retrieved April 03, 2018, from http://www.oisc.purdue.edu/pesticide/pdf/dicamba_faq.pdf
- RUP Dicamba Herbicide (FeXapan, Engenia, and XtendiMax) FAQ. (2018). Retrieved April 03, 2018, from https://pested.unl.edu/documents/RUP_Dicamba_FAQ_2018.pdf
- 2019 Indiana Required Training for Users of Engenia, FeXapan and XtendiMax dicamba products. (2019). Retrieved December 18, 2018, from https://www.oisc.purdue.edu/pesticide/pdf/dicamba_faq.pdf