



**DAVID P. THOMPSON**  
National Marketing & Sales Director  
22555 Laredo Trail - Adel, IA 50003  
Office: (515)-677-2605

**TO: Stine Sales Team & Stine Accounts**  
**FROM: David P. Thompson**  
**DATE: 3/14/2019**  
**RE: Use Of Glyphosate With LibertyLink® GT27™ Soybeans**

At Stine®, we have always been committed to offering growers choices. That's why we offer all of the major soybean trait systems in the marketplace today. With so many different options now available, change is inevitable. But change can lead to complexity and sometimes confusion.

LibertyLink® GT27™ – developed jointly by MS Technologies and BASF – represents the first soybean technology to market that offers built-in herbicide tolerance to both glufosinate and glyphosate. This unique system provides growers with greater flexibility and choice in their weed management programs while providing a neighbor-friendly weed control option.

Recently, an article was written questioning whether or not it is acceptable to apply glyphosate over-the-top of LibertyLink® GT27™ and GT27™ soybeans. The article, and much of the discussion that has followed, contained some inaccuracies and/or incomplete information. This has led to questions from our dealers and customers.

**Following is Stine's position regarding use of glyphosate in conjunction with GT27™ and LibertyLink® GT27™ soybeans:**

1. LibertyLink® GT27™ and GT27™ soybeans tolerate the use of glyphosate the same as any other glyphosate-tolerant crop. The gene that confers glyphosate tolerance in this case has been in use for several years and its crop tolerance is without question. In fact, prior to BASF's acquisition of certain LibertyLink® assets, Bayer Crop Science itself had conducted extensive testing around glyphosate use on LibertyLink® GT27™, including use of Roundup® PowerMAX®, Roundup Weathermax®, GlyStar® Plus, Durango®, Cornerstone® Plus, Glyfos® X-TRA, Honcho® Plus, Touchdown Total® and Roundup Original Max®. Regardless of brand, the results were clear: that LibertyLink® GT27™ has commercially acceptable tolerance to glyphosate.
2. As part of the standard data submission to the Environment Protection Agency (EPA), Bayer Crop Science submitted residue data related to post-emergence use of glyphosate on LibertyLink® GT27™ and GT27™ soybeans. The data demonstrated glyphosate residues were below the acceptable residue levels in soybeans.
3. There are many brands of glyphosate on the market today, and the language used on each herbicide label can vary slightly. But it is important to remember that most of the language used on today's glyphosate labels was developed 25 years ago, at a time when there was just one trait option in the market. As a result, the current label language often does not necessarily reflect the marketplace as it is today.

4. Labels for several brands of glyphosate have been updated in recent years to state that the product can be applied to “glyphosate tolerant crops” rather than naming a specific brand of trait. Most, if not all, of the remaining labels will be updated with this language in the year to come to better reflect the availability of new traits.
5. Even in cases where a glyphosate label refers to ‘roundup ready crops’ instead of ‘glyphosate tolerant crops’ – such as Roundup® WeatherMax®, Roundup® PowerMax®, Durango DMA® and several others – growers can still apply the product on LibertyLink® GT27™ soybeans (as well as GT27™, Enlist E3™ and Roundup Ready 2 Xtend® soybeans). The reason for this determination is because these labels clearly state that the product is legal for use with crops “that contain a patented gene that provides tolerance to glyphosate.” By this definition, use of these products would be considered “on-label” because LibertyLink® GT27™ contains a patented gene that provides tolerance to glyphosate.
6. Although some labels include terms like ‘roundup ready’ to refer to glyphosate tolerant crops, EPA has established precedent of remaining “brand-neutral” in cases like this and has stated that as long as there is demonstrated crop tolerance to a given active ingredient then EPA is not concerned about the particular brand names that may be in use.

It should be noted that Bayer’s stance on this topic differs from ours. Bayer has stated publicly that Roundup® branded glyphosate labels restrict product use to only the trait brands that are specifically listed on the Roundup® labels. Although we strongly disagree, this means that since GT27™, LibertyLink® GT27™, Enlist E3™ and even **Roundup Ready 2 Xtend®** soybeans are not specifically named on these labels, then by Bayer’s definition the use of Roundup® branded glyphosate products with these traits would be prohibited.

Ultimately, the choice of what herbicides to use and how to use them is up to the individual grower and/or applicator. No single technology platform will solve all the challenges growers face throughout the growing season which is why MS Technologies, BASF and Stine agree that soybean growers should have access to ALL trait events. We also agree that growers should have the freedom to use their product of choice over the top of those traited seeds, and this includes the use of ALL forms of glyphosate in conjunction with LibertyLink® GT27™ and GT27™ soybeans. Any efforts to restrict the use of glyphosate to only certain traits or brands appear designed to limit grower choice and deny growers access to these new and better technologies.

MS Technologies and BASF are working with EPA and state regulators to further clarify this issue so that growers can choose with confidence. Stine will continue to support them in these efforts.

Please don’t hesitate to contact your Stine representative with any questions. Thanks for your support of Stine Seed Company.