

New Twist with the Dicamba Products

Earlier this fall EPA imposed new requirements on **Engenia, FeXapan and XtendiMax** for 2018. This week we learned that the changes require each container (package, minibulk and bulk tank) to be relabeled with the 2018 information. Relabeling can only be performed legally at a facility that possesses an active EPA Establishment Number. EPA considers relabeling of these products to be repackaging, and if performed at one of your facilities, it will need to be included on their 2017 Pesticide Production Report.

This relabeling effort involves only the dicamba products sold in 2017, but will require that each and every container (all 2-1/2 gallon jugs, minibulk and bulk tank) be updated:

Engenia, FeXapan and XtendiMax

Each manufacturer has indicated to EPA they will pick the packaged product up and relabel it if requested. We recommend you make this request of your manufacturer as soon as possible. Please note, no additional reporting is necessary if the product is returned to the manufacturer for them to perform the relabeling task.

The materials to relabel the existing inventory in the field will start showing up at facilities in early December. You should fully understand your responsibilities associated with relabeling before agreeing to perform the task.

For facilities that relabel their own inventory by December 31, 2017, please be advised that your relabeling actions will require reporting. The timing of your annual compliance visit in relation to your relabeling activities will determine the course of action you will need to follow for each location affected:

Facility that relabels their containers **before** completing their Compliance Wizard:

For facilities to legally relabel their own containers, the facility must have an active EPA Establishment Number*. If the location relabels their containers on-site before December 31, 2017, but prior to completing their Compliance Wizard, they should report all of the relabeled product (package, portable refillable container and bulk) on their 2017 Pesticide Production Report page as part of the annual compliance visit.

Facility that relabels their containers **after** completing their Compliance Wizard:

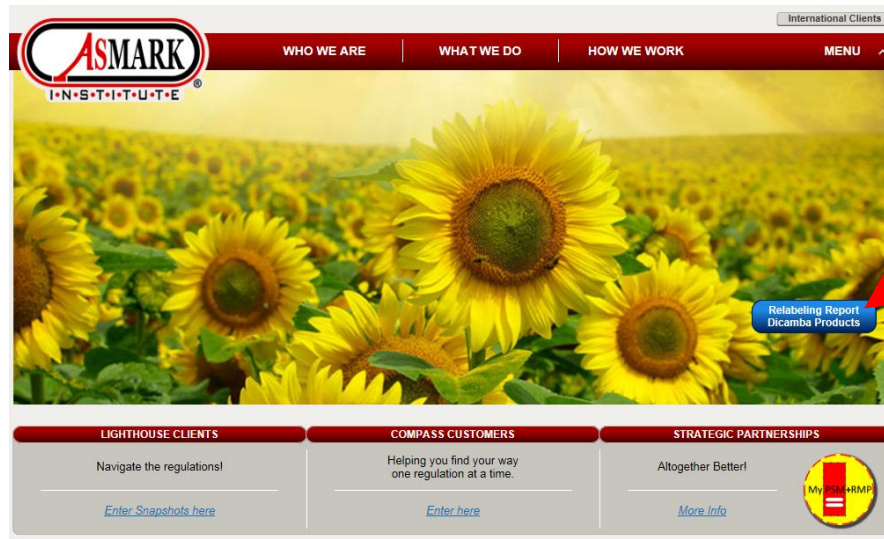
For facilities to legally relabel their own containers, the facility must have an active EPA Establishment Number*. If the location relabels their containers on-site before December 31, 2017, and they have already completed their Compliance Wizard, the products and amounts relabeled will need to be added to their Pesticide Production Report. The Asmark Institute will help you with this. We have designed a special feature on our website for each facility to give us this information in a simple and organized process. Once received, we will add the relabeled products/amounts to the repackaged products/amounts onto the final and complete report for 2017.

* Please contact Customer Service at 270-926-4600 Ext. 506 if you do not have an active EPA Establishment Number.

Instructions To Add Relabeled Information

Please advise your facilities to follow the instructions below to access the tool:

1. Go to www.asmark.org
2. Click on the blue "Relabeling Report Dicamba Products" button.



3. Enter the username and password for the location where the relabeling task occurred.
4. Verify that the information on the screen matches the location where the relabeling task occurred.
5. Follow the directions on this page to add these products and amounts to the 2017 Pesticide Production Report for this facility.

Note: Do Not Duplicate - This feature should only be used by a facility if the products and amounts relabeled have not been included in their Compliance Wizard submission.

Since we are in the middle of the Annual Compliance Visit season, it is very important that you understand the information contained in this e-mail to ensure the 2017 Pesticide Production Reports for your locations are accurate.

Heads Up! It would be easy to get caught up in the requirements of this relabeling issue and forget its purpose. **Engenia, FeXapan and XtendiMax** have been designated as **Federal Restricted-Use Products (RUP)**. Retailers should take the appropriate measures to assure compliance with all RUP requirements once the product has been relabeled.

We are here to help - don't hesitate to contact any one of us in person or Customer Service at 270-926-4600 Ext. 506.

We appreciate your business and relationship that has developed over all the years!