RE: GLYPHOSATE LABEL AMENDMENTS

Hello, from Bayer Crop Science.

As you may have heard changes to the way glyphosate is labelled will be coming into effect as of April 28, 2019. Below you’ll find a helpful summary of everything you need to know.

Background:

In April, 2017 Health Canada’s Pest Management Regulatory Agency (PMRA) granted continued registration of products containing glyphosate for sale and use in Canada following an extensive re-evaluation. The re-evaluation is a standard process conducted by the PMRA that takes place on a regular basis for all registered pesticides. This process is important to ensure that all registered pesticides continue to meet the stringent and modern standards imposed by the PMRA.

The PMRA outlined some changes to the label and required that all glyphosate packages sold and distributed by all registrants after April 28, 2019 bear an amended label. Some key changes are:

1) Restricted Entry Interval of 12 hours, as no re-entry period was stated previously
2) Additional precautionary statements on drift
3) Environmental Hazard Statements
4) Additional Directions for use and a buffer zone table
5) An Aerial application requirement

A complete summary of the changes can be found at Cropscience.bayer.ca/labelchanges

Bayer is working proactively with retailers and central distribution warehouses to ensure inventories of legacy Monsanto branded glyphosate sku’s bear the amended label to enable sales after April 28, 2019.

Relevant products are: Roundup Transorb® HC Liquid Herbicide, Roundup WeatherMAX® with Transorb II Technology Liquid Herbicide, Roundup Xtend® with VaporGrip® Technology Herbicide, R/T 540 Liquid Herbicide and VisionMax® Silvicultural Herbicide.

Why are you sending me this information?

This is a stewardship initiative to ensure you are aware of the label changes as you may receive product with the un-amended label prior to the April 28th deadline. To be clear, the product contents have not changed, the product remains fit for use, we are not asking for the product to be returned and the product should still be used as per your normal plans this season. From a stewardship perspective, we ask that you please review and follow the requirements of the amended label for the products you purchase.

At Bayer, we will continue to be committed to proper stewardship relating to the use and distribution of our products. We also recognize the importance of products like glyphosate and we will continue to actively support and defend the safety and use on behalf of our customers. Please feel free to visit
Cropscience.bayer.ca/LabelChanges for more details or reach out to anyone of us at Bayer if you have any further questions.

Sincerely,

[Signature]

Rob Schultz, Vice President, Sales
Crop Science Division, Bayer

Frequently Asked Questions

Q. Can I continue to use Roundup® branded glyphosate products on my farm today?
A. Yes, you can continue to use all: Roundup Transorb® HC Liquid Herbicide, Roundup WeatherMAX® with Transorb II Technology Liquid Herbicide, Roundup Xtend® with VaporGrip® Technology Herbicide, R/T 540 Liquid Herbicide and VisionMax® Silvicultural Herbicide products on your farm today.

Q. Do I need to return any product I may have already on my farm?
A. No, do not return any product to your retailer.

Q. Are any further changes anticipated for the glyphosate label?
A. No further changes are required for the glyphosate label. All new product formulated and shipped will contain the amended label.

Q. Does this label amendment affect all glyphosate or only legacy Monsanto’s brands?
A. The re-evaluation of glyphosate and the consequential label amendments are applicable to all glyphosate labels. Please direct all questions regarding other glyphosate labels to their applicable manufacturer.

Q. Why were these label changes requested by the PMRA?
A. In April 2017, Health Canada’s PMRA granted continued registration of products containing glyphosate for sale and use in Canada after a rigorous eight-year re-evaluation. The majority of the changes to
glyphosate-based herbicide labels were aimed at providing consistency in labels across all glyphosate brands, and introducing mitigation measures to further manage any potential environmental, human health, and occupational exposures.

Q. Was the product unsafe for use under the current/previous label?

A. No. The PMRA confirmed the safety of glyphosate, which has a 40-year history of safe use in 160 countries around the world. The PMRA conducted a standard re-evaluation process and implemented the required changes to ensure the label remains current in today’s regulatory environment. Bayer fully supports the implementation of the label amendments.

Q. I see there were changes under the Commercial Agricultural Products portion of the label, regarding elements such as the reentry period, drift, environmental hazards, buffer zones and aerial application. Why were these changes made to the label?

A. Roundup branded herbicides already provided label language speaking to these areas of safe application. The changes made by the PMRA were aimed at providing consistency in labels across all glyphosate brands and outlining additional safety precautions and additional mitigation measures to further manage risk.

Q. What were the conclusions from the PMRA’s Re-evaluation in 2017?

A. PMRA reaffirmed the safety of glyphosate, stating:

- It is not genotoxic and is unlikely to pose a human cancer risk;
- Dietary (food and drinking water) exposure associated with the use of glyphosate is not expected to pose a risk of concern to human health;
- Occupational and residential risks associated with the use of glyphosate are not of concern, provided the updated label instructions are followed;
- The environmental assessment concluded that spray buffer zones are necessary to mitigate potential risks to non-target species (e.g. vegetation near treated areas, aquatic invertebrates and fish) from spray drift;
- When used according to revised label directions, glyphosate products are not expected to pose risks of concern to the environment;
- All registered glyphosate uses have value for weed control in agriculture and non-agricultural land management.

Q. What are the changes to the label?

A. PMRA has outlined some changes that will be required to be implemented. The large majority of these changes are aimed at providing consistency in labels across all glyphosate brands and to introduce mitigation measures aimed at further reducing environmental risks, human health risks, and occupational exposure. The key changes are as follows:
1. Restricted Entry Interval (REI) – The restricted entry interval is 12 hours after application for all agricultural uses. Previously this information was not included on the label. It is being added to reduce occupational exposure.

2. Additional precautionary statement on drift – The statement, “apply only when the potential for drift to areas of human habitation or areas of human activity such as houses, cottages, schools and recreational areas is minimal. Take into consideration wind speed, wind direction, temperature inversions, application equipment and sprayer settings” will be added to the label.

3. Environmental Hazard Statements – additional statements will be added. E.g. “toxic to aquatic species.”

4. Directions for use and buffer zone table - Will be updated. Essentially more detail and more specificity is being provided.

5. Aerial Application Requirement – The statement, “take wind speed at flying height” will be added.