

WSSA Science Policy Committee
Quarterly conference call
October 26, 2010

LVW- I have Hilary Sandler, Donn Shilling, Rod Lym, Chris Boerboom, Harold Coble, Mike Barrett, Jeff Derr, Linda Nelson. OK, I had eight points on an agenda, and I think we can get through this pretty quick and be off the phone in half an hour. The number one issue the past couple months has been herbicide resistance. We're working on that from many different angles with the agencies, other stakeholder groups, of course industry, and we are coming to the conclusion of the first APHIS EPA funded white paper, that Bill Vencill's group is leading. There's seven other authors on that paper. Final comments have been submitted by the authors, and Bill's incorporating them, and so the full version of that, which is about 90 pages, single spaced, will go to APHIS next week. We can also circulate that to the Science Policy committee. There's really not much in it that's controversial, it's kind of a recap, definitions, terminology, where weed resistance is, it lists a number of species states and that kind of thing, trying to do some estimating and projections on acres infested with resistant weeds and outside of that it's pretty straight forward. Moving forward on that, the next step is open access publication of that paper in Weed Science. We're still debating the format, if we want to do a special issue on that or do we select the last few chapters of that paper and publish that in Weed Science. Mike?

MB- Not too much more news. I spoke to Jim Anderson, editor for Weed Science publications, and he was very receptive and excited about the idea. We've approached a publisher for cost estimates, and that's what we're waiting to get back right now. However, the feeling is that we want to go to a special issue. There's probably sufficient funds in the grants remaining to help defray those costs. I really think there's a good chance to do the special issue.

DS- Mike, is that going to be a special issue within Weed Science?

MB- Yes, I think the idea is that it would come out under the Weed Science banner, but it would be a completely additional issue for the year. my assumption is that all subscribers would get one, and there would be additional copies available, too.

DS- Almost like what we used to call a monograph, a stand-alone special issue.

Mike- yes, and it would be peer reviewed, too.

DS- Lee, the paper as it exists today, which has gone through extensive revisions and rewrites with various groups of scientists will be submitted to APHIS on November 1. that is part of an agreement, it's part of a grant. Because there's a little bit of controversy over whether it should be peer reviewed at this point, but Lee and the board and several other people decided. Technically, it's a report to APHIS, fulfilling our obligation to them. I know there's some additional language But after it's been submitted to APHIS, then it can be peer reviewed in a normal scientific manner prior to publication. Is that kind of what you guys were thinking about doing?

Mike- that's the working model, I would say. And I feel, for the authors involved, it only increases the stature of what they've accomplished.

LVW – So the grant contract for the first paper, the funding ended on the federal fiscal year, October 1. We're pushing that deadline by a month already, and that's why we're trying to get this report to APHIS, and then go forward with Weed Science publication. The APHIS 2 paper, the one that's being led by David Shaw, they're making good progress. They have a team together, they met in Memphis, I believe it was in mid-September, and they're expecting to have that paper together by this summer, mid-June. That's where they're currently at.

Mike- Possibly even sooner than that. I think the idea is to have a public unveiling in, let's say late spring. That's an aggressive, optimistic time frame, but that's what we're thinking right now.

DS- Lee, just a suggestion, and David may already know this, but I would suggest that you make this clear. After the team or committee that David's assembled to write the second paper, once they're done with their writing and their revisions, just like this time, it can then be provided to APHIS as part of the agreement for the grant. Then, if there's an additional need or requirement to publish, then it can be peer reviewed again through the normal scientific process, for phase two. I don't know if that's what you want to do with the second paper, I'm just suggesting you avoid some of the, ah-

LVW- yeah

Mike?- Donn, I know you have some in-house experience there, with this. I was just going to say that APHIS 2 is learning all it can from APHIS 1.

Janice- The first one, when it's appropriate, after APHIS/peer review for the first one, is for the Public Awareness Committee can do anything to help spread the word. We can talk about it in one of our calls.

LVW- Yes, thank you, Janice.

Mike- I think one of the ideas was to ask APHIS if they want our help in publicizing it?

Janice- Yes, anything we can do to help or reach out in any way that they are comfortable with, we're happy to do. So just let us know at the right time if we can help in any way. This is really a new era for the Society, and for all the people who did the scientific work and it's really something to celebrate.

LVW- I realize on my agenda, my main point on #2, I put herbicide mode of action labeling, and we've been really sloppy and it should say herbicide mechanism of action labeling. I need to get in a better frame of mind, and when I'm talking to people, say mechanism of action, because we have been using the wrong terminology. When EPA is looking to move forward on herbicide mechanism of action labeling, that's what we need to call it. On that point, now that it's posted on the WSSA website, the first item in the middle, they have summarized mechanisms of action into 16 groups, and so there's a 6-page document there that explains the classifications. That is the official WSSA format, as of now, and what we're working with EPA on now. There is some confusion out there in terms of the groups. There's something like 28 groups, different from what's in the herbicide handbook, but we want to go

with the 16 mechanisms of action that are on the WSSA website. As I did mention before about the EPA, we did meet with them when Jill Schroeder was in town, and David Shaw, and Harold, you were there. They tend to move forward on the mechanism of action labeling, the only problem they're having is how do they move forward with this. They do have, already, voluntary mechanism of action labeling. The manufacturer can put that on the label if they want, at this point. Some manufacturers have, some have not. So how do they go forward, do they need a rulemaking section? My understanding is that there's going to be some pushback from generic manufacturers of Roundup, especially from China, that are not going to want to go through that extra cost, but the intent is that the EPA will be moving forward with at least that, the mechanism of action labeling. Now, in terms of language, for resistance management, certainly differs among disciplines, and there's a lot more controversy there on how that might go forward. There might be some general language, but their main priority is still the mechanism of action labeling that they'll move forward with.

??- At Syngenta, most of our products have the label on it already, but on the mechanism vs. mode, we ended up changing in toxicology and risk assessment as mechanism being knowing the exact molecular protein target and mode being when you understood the chemical pathway. From that definition, and we wouldn't go against it b/c there's a lot of policy and draft guidance and final guidance out there, they called it mechanism, but from a strictly semantics point, some of our classification groups would be mode of action. Second, in costing, because it's voluntary, in our smaller consumer products, sometimes there's difficulty because of sizing. But for the big products, we just put it on when we were getting ready to do new label changes or packaging, so we've worked it in so that the cost of that was not substantial. We just worked it in on the next batch of labels, because we've had to put a lot of required language in some. As the debate continues, it'll be interesting. We want to hear all sides and not burden people. But on the voluntary side, it hasn't been difficult for some of the companies, and others I know it has been.

LVW- okay, we've had two hearings by the House Oversight Committee, House government Reform and Oversight, which has a subcommittee on Domestic Policy, and it's chaired by Dennis ?? from Ohio, and he's very anti-biotech. One hearing focused on the science, and we had three weed scientists there at the end of July, and then the last one here in September was titled "Are superweeds an outgrowth of USDA biotech policy?". So, he was going after USDA, in particular, APHIS and why they haven't used the Plant Protection Act to ban or prevent or regulate the planting of Roundup ready crops. Under the Plant Protection Act, it was written with the intent of noxious weeds moving from state to state, prohibiting their introduction, not the intent of restricting the planting of Roundup ready crops. A noxious weed could be something like Palmer amaranth, and APHIS could classify it as a noxious weed, and in order to prevent the spread, APHIS could then restrict the planting of Roundup ready crops. He went after the undersecretary there, Ann Right, and she looked like a deer in the headlights. The guy that's under her, Sid Able, at APHIS, with the Biotech Regulatory Service, Sid's been our main contact working on these papers. He understands the science of this, and agrees with us, that that is absolutely the last things that APHIS wants to do, tell farmers when they can and cannot plant roundup ready crops. And at the secretary level, Secretary ?? is pro-biotech, and there's no mention whatsoever that USDA would be heading in that direction. In addition to that clause, section 412 in the Plant Protection Act that

regulates the movement of plants, plant products, biological control items, noxious weeds, and their means of conveyance, right underneath it, there's a section on using ?? science on these decisions. Certainly WSSA's official standpoint on this has been, from an education and extension outreach capacity, on getting the message out on how to manage and prevent Roundup resistance, not from a regulatory mode. I think we're going pretty good there. Of course, this did get a little bit of press. We had Jay Broom, the CO of CropLife America, he testified. And they had a guy from Redbull Tomato? There, I believe he was from Ohio or Indiana, saying that they're very worried about resistance in their crops. They keep talking about more toxic herbicides, and less toxic herbicides, and the terminology, the way they use it, gets muddled up. In the end, ?? has no regulatory authority over this, he doesn't write farm bills, he doesn't have authorizing power, he's not on an appropriations committee for agriculture, so there's really nothing that he can do given the jurisdiction that he has in this House Oversight and Government Reform committee. But the WSSA's name was brought up many, many time during the course of that hearing as providing the science and expertise on the policy, and also the mention of the APHIS papers, the white papers that we're working on. It's probably the most WSSA's been mentioned in a hearing, ever. We got publicity whether we like it or not. It's a far cry from where we were five years ago, so I think this is going to work out in the end, but it did provide for some entertaining comments.

??- It's a white feather for your cap.

LVW- Some of the volatility issues that I heard being talked about This is something we're going to have to be careful about from the science point of view. I'm sure there's research going on out there, and some of the claims I've heard are that there's going to be no volatility, or way less than we've had in the past. we just have to be vigilant on it and be sure that the science backs up the claims. NPDS- while there's been quite a bit of activity here in the last month and a half mostly on Capitol Hill, we had a hearing at the Senate. The Senate Ag committee had a hearing, and the covered a lot of different issues. NPDS was the main focus. Right now, EPA is supposed to have a draft permit given all the comments they received in July; they're supposed to have that done by September..part of that permit language deals with the Endangered Species Act. The National marine Fisheries Service have to provide these consultation on endangered species and that information has to be included in the NPDS permit if you're applying a herbicide that might be near a protected area where there might be an endangered species. NMFS came back last week and said they're not going to release any recommendations until they have all their findings done, which basically says that EPA cannot move forward with the permit, and they'll be breaking the law of the Endangered Species Act if NMFS doesn't cooperate with the language on these endangered species consultations. No one really knows how this is going to play out, but it certainly seems highly unlikely that there's going to be permit language ready by April 2011, which is what the expected date is. Now there are three different bills, one in the Senate and two in the House that have several cosponsors that herbicides applied according the the ?? (FIFRA)?? Label are exempts from the Clean Water Act permits. It would override the 6th circuit court ruling mandating that EPA produce these permits. The one bill in particular, the one by Chairman of House Agriculture committee, Colin Peterson, who was kind of lukewarm on the issue for quite awhile, but all of a sudden he's got a lot more interest in it, is a much more comprehensive bill. It helps clarify the Clean Water Act itself, there's

issues with definitions of waters of the United States vs navigable waters of the US. There's a whole bunch of issues there, so it's comprehensive and defines all of that, plus it defines the exemption from the Clean Water Act. I know the Pesticide Policy Coalition has been working on this. We met with several different members of the House and Senate Ag committees. When the elections are over and they come back for their lame duck session, there is going to be a push, and it's going to be a longshot, to get one of these bills attached into an omnibus, an omnibus appropriations bill that's going to have to be passed, b/c we don't have a budget. We don't have any of the appropriations bills passed yet. There's a chance they can get that legislation going, otherwise we'll be into March probably before you see any kind of legislation that will pass both the House and Senate. Right now, we still take the same point of working with EPA on any questions they have regarding their permit language and how they should move forward. If and when this legislation gets put into a bill, we will be behind it 100 percent. Official policy is WSSA has always been supporting the science based risk assessment that are in FIFRA, and that a product shouldn't be under double jeopardy by requiring a Clean Water Act when it's being labeled by one part of EPA and denied by the other side of EPA. We are definitely opposed to that. OK, speaking of the federal budget, it's not looking very good in terms of seeing increases. In the House and Senate bills, we did see the increase in funding for NIFA, for our grants program, from \$260m to \$429m, but if they cannot pass the budget, every program, it basically gets flatlined. They can only use the dollars from last year's number, which is \$262m, and in a way you can look at that as a cut. Certainly it prohibits NIFA from expanded to any new kind of grant program, which is very problematic for us, as weed science was vaguely omitted from most of the grant programs, and we're losing our existing program. So, we've got to hope they get a budget through. Talking about response to our various letters, you can argue that most of it was copy and paste response form, but there was a session there addressing what was unique to the weed science area. I know the secretary is concerned about herbicide weed resistance from the very top level. We just have to hope that there is some money there when they get this budget passed, and we'll get some NIFA funds. There hasn't been any other information in terms of when they will release the next RFA, but they really can't release an RFA until they actually know what the budget numbers are dealing with. They were talking a December 1 release, but that is clearly not going to happen.

Rod- When they do push those back like that, are they going to shorten the amount of time that we scientists have to write? Are they going to have them all done by April or May, or what are they going to do?

LVW- In the meeting we've had, they've always said that they would provide enough time to look at and review the grant programs. They've always said that they'd be generous with time, and I haven't seen anything to indicate otherwise, so if things get pushed back, they'll certainly push back the submission dates.

Linda Nelson- What are you hearing about the 2012 budget, b/c we're not hearing very good things in the Corps of Engineers. I assume all agencies are having the same issues, and I'm curious if you're hearing anything.

LVW- The Aquatic Plant program within the Army Corps, what I heard was, zeroed out basically. I know we were working on a press release on that to call attention to it. They explained it to me that you have a new leadership in that area, in the Army Corps of Engineers

Linda Nelson- I'm not sure what that's about, but from what we've seen, and it's just internal. The budget of the corps has gone from the assistant secretary of the army to the OMB? and that's where it is at this point. And we've seen some documentation of programs that are going to be terminated, one of which is the Aquatic Plant Control research program, which is the only federally authorized program for R&D on aquatic vegetation. There's a point where it will be more of a public document, rather than just we've been hearing an internal thing and I've seen some paperwork. I don't know what we can do at that point, if we can do anything, but I have seen other memos where all federal agencies are receiving cut budgets drastically for 2012. So I assume it's not just the Corps of Engineers, but also other agencies.

LVW- What the funding, wasn't last year something like \$5m, with total authorization around \$15m?

Linda- Total authorization is \$15m, but we've never received that amount. When you take out earmarks, I think the budget was 4.1, we were expecting \$4million this year. It remains to be seen what the final budget will be, and whether that will happen, or we'll just be under continuing resolution, who knows. If so, like you said, we stay with our 2010 budget levels. But right now, it's not looking good for us for 2012, and I just didn't know if other agencies were having the same sort of issues.

LVW- Not to the extent of being zeroed out. we need to get some meetings set up and go in and talk, whether it's OMB or, it's not under water and natural resources, but I forget the name of the committee. But, yes, we need to send some letters and set up some meeting, because we have to fight for that.

Linda- I can help provide information if anybody at WSSA can help.

LVW- As you say, it's the only funded aquatic plant control program in the country, and it's not like we're breaking the bank with \$4m.

??- How did that come about?

Linda Nelson- The first week in August, when all the memos from the White House came to all the federal agencies about the 2010 budget, and please provide to OMB where your cuts are going to come from and what programs you're going to terminate. That started the first round of budget cuts. We provided all the justifications to keep the program. The next budget we see, the program was back in place, at a reduced level, but fine, atleast it was in. and that was end of August, and by the second week in September, in their second series of slashes, the Aquatic Plant Control research program was again zero. We didn't have a chance to comment and provide justification again before it went through. Passback from OMB to the corps will not happen until after Thanksgiving, and at that point, then, it's not an internal document but out for everybody to see then.

??- Yeah, it's important to know the minute that it's allowed to be out in any public way. Lee, is there a way to get that info before they release it, through FOIA? I'll check, too, on my end.

LVW- Not really, OMB is pretty protective of their numbers until they release them on February 1. But certainly we can track down the staffer that handles it and try to get some more information on how that decision was made, and why. Linda, I'll follow up with you on this.

Linda- Sure, and I didn't mean to jump in, but since we were talking about budget, I figured I'd mention it.

LVW- ok, last two points, National Invasion Species Awareness Week.

Chris B- Lee, if I can jump in, when you're talking about AFRI and prioritizing budgets and allocating funds, have you made any plans to tie the release of the APHIS white paper on resistance as a justification to potentially allocate part of that AFRI portfolio into weed science related research and extension projects? Have you thought about it? How you can leverage or parlay that product against some of the budget needs that we have?

Lee- I haven't given a lot of thought to it outside of sharing the paper with Fitsner? and those guys over there and saying "here's the latest findings." But that's a great point.

Chris B- That's a great opportunity right now to jump on that, especially with the heightened awareness, and also following up on the Hill of the loss of NRI programs from previous years.

??- Lee, that's something that a lot of people could put their arms around

Chris- When you talk about NIFA priorities and global food security and sustainability and such, it would fit right into that, we just need to have a niche where we're actually mentioned. This may be that opportunity.

LVW- I'll have to give some thought to that, that's a great point Chris.

??- One thing we could be thinking about, instead of the general public awareness, how to we do an awareness to focus research or energize research interest. It would be a different type of outreach, a different type of audience, and it wouldn't necessarily be letters, but it would be something to have that be the end result. To have the interest be on peoples' minds.

LVW- Now, one thing I want to talk about in terms of the report we're going to submit to APHIS next week vs the final product that goes into Weed Science. APHIS will have their report, and they'll be happy. Now do we wait for the full version, the special issue publication of Weed Science? Otherwise, we end up, by the time it gets into Weed Science-

??- That's way too late, Lee.

Donn- I don't know how this works with contracts, but technically when you submit a report as part of a grant requirement, it becomes the property of the granting agency. And as most of you know, once you

submit an article to a journal, technically it becomes the property of the journal. I'm just suggesting from a legal point of view, once we submit that report to APHIS, we would have to get permission, technically I think, to use it. We would have much greater flexibility in terms of how we use it after it's published in Weed Science.

??- One thing you might do, Lee, is when the report is submitted to APHIS, see you if you can get some kind of release from them to use it to go to other agencies. Or ask them to take it to other agencies. There should be a copy of that in the secretary's office with Max ?? as soon as possible.

Donn- I wonder if a letter from the president of WSSA asking at what level of discretion can we use the document that submitted as part of our grant to them at our discretion. Maybe a phone conversation would be easier. APHIS may give up written permission to use at our discretion.

??- They might, but certainly they ought to give permission to use it within the federal government.

DS- Yeah, I see your point. I'm just suggesting that it may be useful to have John Jachetta, as president of WSSA, request and have a discussion with APHIS to find out at what level of discretion are they comfortable with. And if it's restricted to federal agencies, at least we will have that in writing.

??- Yes, and if we're talking about influencing NIFA, of course Roger has to be influenced. But in order to influence Roger, the secretary's office, particularly Max ?, because he's over all the ??? agencies, needs to understand that document.

Mike- The grant actually calls for open access publication, so yes, we do want to ask APHIS for their permission at this point.

Donn- yes, I just think it would make it clean.

LVW- I was just looking at it from a PR standpoint, that we'd be citing Weed Science, and getting Weed Science out there instead of APHIS report.

??- It would be nice if we could publish at the same time, but we can't.

Donn- No, it's going to take awhile. Now, Lee, back on NIFA, are we going to continue our ongoing dialogue with ?? and their internal national program leader for weed science. Beyond the budget situation, the issue of weed science as a standalone category continues to be, in my mind, an important topic. I know we've had a series of conversations with B?? Are there plans to continue that dialogue?

LVW- We're waiting to see what they come up with for this next round. I'm certain we're going to have all kinds of comments on that.

??- I've lost track of where we're at. I know Michael's not in the loop anymore, so do we have a person that we need to make re-contact with, meet with, touch base with? What should we do or be doing now? Waiting doesn't seem to be doing it.

LVW- Mike Fitsner? is the program leader for Plant Pests, and he is the featured speaker at the SWSS meeting in Puerto Rico. Certainly we can meet with him before that, especially if we want to highlight this report and talk to him about it and let him know it's out there.

??- maybe we can deliver one to him.

LVW- yes, exactly. I think that's a must.

??- Yes, let's not forget that.

LVW- Duly noted. Ok, quickly on the last two things. National Invasive Species Awareness Week is being fixed up to get Lori Williams, who is the leader, CEO, president, of the National Invasive Species Council. They are a group appointed by the executive order on invasive species in 1999, and they haven't had a lot of involvement in the past, so the fact that they're leading this is good. I've been with them, with Lori, on the conference calls, helping organize this, and that is set for Feb 24-March 4, 2011. Now specific to weed science, we've been working with the Healthy Habitats Coalition, and they were initially going to meet in DC the same week as National Invasive Species Awareness Week. Some of their wires got crossed, and they felt that we'd be in too much of a conflict, which to me didn't make any sense, so they've decided to push their meeting date back to the week of March 21, 2011. They have five specific asking points that they want to basically lobby the whole week. They'll have one day of a kind of training and background, and two days of lobbying, just meeting with House and Senate leaders and some of the agency groups that are involved, USDA, Dept of Interior, etc. So that's where we are with that. Mike Barrett and John Jachetta and I are going to be meeting and heading to town for that HHC week, the week of March 21, and so we'll have some weed science specific meetings, which will be nice, along with the general stuff. Basically, they're looking to get more on-the-ground weed control money, especially for the federal lands and so forth, trying to get that money set aside, and to use that money more effectively.

Mike- I know John and I are going up for Healthy Habitats week. What about All Species week, for WSSA involvement?

LVW- That is me right now. I'm working on setting up a congressional briefing on invasive weeds on Monday of that week. I haven't decided who I'm going to fly in and what we're going to talk about, but that will be at the House Agriculture committee and until I get anything more specific on the agenda for NISA, I'm not going to commit WSSA on the full brunt of this just yet. I'm helping out with time and effort, but we haven't contributed anything outside of that.

Mike-And the days for that again are?

LVW-NISA is February 28 to March 4, 2010...Janice, are you still on? I don't mean to put you on the spot, but do you have any update on ??? I know you've been quite busy on that.

Janice-No I don't. You know, the hearings covered parts of that, some of the growers came in on just the complexity of having trial lawyers go to the New York Times and having a big re-review. The good news is we finished our fourth science advisory panel of the year. Two science advisory panels have

come back and said along with the EPA that the studies that were originally touted in the New York Times are lower tiered epidemiologic studies. We call them ecologic studies, talking about birth defects and water exposure, and were not strong on regulatory rigor, and would not have called for a re-review. There's been new mode of action work being generated, and there was some level by both the government and Syngenta. We've continued to look into, from the mode to the mechanism, back to our original discussion here, and those data, from what we've seen from all the science, continue to show that the way Atrazine(?) is regulated today is very protective. The state of Minnesota finished a review in January of this year, a year long review, and said that. And Australia and the World Health Organization just raised their chronic water number. We're regulated in the United States by 3 parts per billion in the Safe Drinking Water Act and the World Health Organization had been 2 parts per billion, and they just raised their number to 100 parts per billion. The new science shows that you have much less uncertainty, and you just see that the regulations were protective. We feel that this last SAP, the questions about the mode of action not being enough to cause a new regulatory standard, which was being asked of the science advisory panel, should we have a more stringent regulatory standard, should we monitor more frequently, none of that was answered with any emphatic soundness. There will be another science advisory panel in the first half of next year, hopefully June because what they've done is pushed up the re-review of the ??? which were going to be in 2013. You know all of our company's products are under re-review schedules. Currently Syngenta has 7 products under re-review, and Atrazine was supposed to be scheduled for 2013, except for the brief sudden re-review. And because of that, we're doing any of the new studies on a faster basis, and we are answering all of the scientific questions with data. The reason Syngenta's chosen to do this is because if they had it wrong about Atrazine for fifty years, that can really shake the confidence in the regulatory framework for all of our pesticides. We feel every step of the way that it's been protectively regulated, and to now have these questions as if perhaps it hasn't been, we really want to protect the regulatory framework for all of our customers. We're going to produce the data needed because we don't want to set non-science based precedence for all of our other products. And so we expect a very good SAP next year, and we appreciate all of the support. The growers came out, and a lot of the grower groups are being subpoenaed by these class action lawyers, and this has really energized them to say that the lawyers are using the fact that it's under a re-review to cause questions, and it's really that. And then the grower groups are getting subpoenaed, and it has made them pretty angry about a re-review that maybe shouldn't have happened. Where we are in the process right now, the re-review was not warranted, but we are in the process now, so we'll just scientifically go through it. We'll keep you posted. The science advisory panel report won't come out until December from this last one, but the other three have already been issued. We think EPA will have more of their or their complete regulatory risk assessment done by late next year. But we expect it show, if we keep fighting with the data, that the regulatory framework has been protected, not only in the last three years or five years ago, but today. I think it will be fine. But the growers are upset, and they've written a lot, both to ?Lisa Jackson? And to the Hill. I should say that the EPA scientists have been very, very, well they're just trying to do a thorough job. They've been asked to do a re-review, and they're just trying to do it. A lot of people would have been much more emotional or angry than I just told you, but I think the scientific framework is what we have to stay focused on.

LVW-Just one quick comment on spray drift, and then we can end this call. I thought we had a very successful spray drift demonstration by Bob Wolf. He came into DC and we probably had over 100 people in the conference room where he did his presentation. It was pretty similar to what he did in his seminar at the WSSA meeting in Denver. He had actually brought in the spray table, and the whole nine yards. So it was a great piece of education and outreach there, and I think it helped a lot of EPA people understand the issue better. There was comments on spray drift that we submitted earlier this year, and EPA has backed off from them. But apparently they're going around to different states and checking with the individual states on if they have language that says do not apply this product if you think spray drift could cause harm, which is very vague language that we disagree with, versus the standard, which is should cause no adverse effect. There's too many open-ended questions on "could cause harm."