

Exhibit 28

MONSANTO



MONSANTO COMPANY

800 N. LINDBERGH BLVD.

ST. LOUIS, MISSOURI 63167

PHONE: (314) 694-1000

<http://www.monsanto.com>

October 12, 2016

Otis Howe, Chairman of the Board
Terry Walker, Director
Arkansas State Plant Board
1 Natural Resources Dr
Little Rock, AR 72205

Dear Chairman Howe & Director Walker:

In response to the September 30th vote by the Arkansas State Plant Board to move forward with proposals to further regulate, and effectively ban, the use of Monsanto's dicamba products for in-crop applications on traited dicamba tolerant cotton and soybeans in the state of Arkansas, I am requesting clarification as to the current registration status of Monsanto's M1691, Roundup Xtend™ with VaporGrip™ Technology and XtendiMAX™ with VaporGrip™ Technology, as well as on the requirements for future registrations.

Prior to the recent action, the Arkansas State Plant Board approved and registered M1691, Roundup Xtend™ with VaporGrip™ Technology and XtendiMAX™ with VaporGrip™ Technology for conventional uses. Further, the proposed regulations were developed to allow and encourage use of these much-needed, less volatile products in the state of Arkansas for over-the-top use once EPA accepted the new supplemental label language.

Though not captured in the minutes, I understand there was significant and pointed discussion during the recent hearings that the Arkansas State Plant Board intends to retroactively require Monsanto to solicit additional research through the University of Arkansas; and until that research is completed, the Arkansas State Plant Board will not approve our lower volatility products for over-the-top use.

As the minutes do not specify the exact research requirements, this letter serves as a request for a detailed list of these newly determined, and retroactive, requirements deemed necessary to process or continue our registrations that have, in fact, been in place since 2014.

Sincerely,

Thomas M. Schmidt
Chemistry State Regulatory Affairs Manager