Exhibit 31

ARKANSAS
STATE PLANT
BOARD

Terry Walker
Director

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October 20, 2016

Thomas M. Schmidt
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, MO 63167

Dear Mr. Schmidt:

All the products you have inquired about, M1691, Roundup Xtend™ with VaporGrip™ Technology and XtendiMAX™ with VaporGrip™ Technology will undergo registration in Arkansas when/if they receive a federal label and registration application is submitted to the Arkansas State Plant Board. After becoming registered, every product may be subjected to restrictions on usage by state regulations.

The rules adopted previously on these products applied "For the first year of registration and the following year....." To my knowledge none of these products have received a federal registration yet which makes the rules moot.

Since the widespread problem was experienced during the 2016 crop year, the Plant Board determined it was appropriate to revisit the rules to see if they were still appropriate and adequate. All discussions held with Monsanto personnel over the last several years contained a request for access to data and the desire to have researchers in the state be allowed to conduct local research on the products. No data from third party scientific studies has been provided and University of Arkansas scientists have not been allowed to conduct the necessary studies to develop local results. Again, this occurred in spite of repeated requests to have third party results and preferably results from our university scientists made available.

I do not agree with the characterization of the research requests as "retroactive" nor "newly determined" since the requests for such data has been consistent in all discussions.

The acknowledgement of the M1691 being "essentially" the same product as "Clarity" came after the current rule was adopted. The past history of the performance and problems resulting from the use of Clarity has resulted in an increase in the concern about releasing the M1691 product without some restrictive safeguards being put in place.

The Plant Board is very concerned about keeping any effective new technology available for producers to use and have taken the approach of trying to curtail usage of products unlabeled or with a history of developing problems from usage.

The concerns of improper usage of older formulations of dicamba containing products on the new genetic traits crop varieties have proven to be well founded as evidenced by the widespread appearance of symptomology of dicamba exposure on non-resistant plants. It is felt this situation only strengthens the need for appropriate controls on products that have exhibited problematic performance issues in order to offer some protection to producers (including producers of non-agronomic crops) that do not want to grow only crop varieties with the dicamba resistance trait.

As a regulatory agency, we do not make a habit of pre-determining the research that would qualify a product for registration. Rather, we depend on the information developed by scientists, who are in the business of providing answers to producers and manufacturers about the performance of pesticides. Those scientists are in a much better position to determine the questions that need to be asked and the information that is needed to adequately answer those questions. Obviously, if the researchers are not afforded the opportunity to use, evaluate and provide recommendations on the efficacy, effectiveness and usability of a product, the necessary information needed to establish regulations for the product (if any are needed beyond the normal label directions) is not available. Lack of information could result in more stringent restrictions being placed on a "new" product or possibly banning the product under some conditions.

In conclusion, the characterization you utilize in your letter requesting "*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*" is incorrect. The requests for research results from third party sources, preferably from University scientists and more preferably from scientist working in Arkansas, have long been communicated. They even predate the 2014 rules that were adopted. That adoption was based in a significant amount on the assurances of Monsanto of the impending label issuance and that the desired third party information would be made available quickly. That scenario indicated a quick response was dictated with respect to getting rules in place.

I am sure you can appreciate the fact that promulgating and establishing rules is not a quick and easy process. It takes a significant amount of time and coordination of all the entities involved. The situation, as presented by Monsanto, was deemed worthy of establishment of rules. As you

know and as stated above, the rules adopted were relevant for the time frame stated. Again, the situation has changed from 2014 and a review is underway to refine the rules.

Also, in your statement you state the registrations have been in place since 2014. That is incorrect. Rules were established in 2014 but the product has not been fully registered for general use because it does not have an approved label. The current registration is specifically for seed production and experimental use but the availability of the product for those uses is controlled by Monsanto. The current registration on a supplemental label does remain in effect. There have been no regulatory actions taken with respect to the approved usage of the product when used according to the established label.

Plant Board staff have always been available for discussion and remain available for additional discussions. However, the Board of Directors is responsible for any official action taken and they remain committed to having access to information they deem acceptable to base decisions on.

We look forward to receiving comments relevant to the consideration of establishing rules on usage of products containing dicamba and being able to assess concerns conveyed in those comments. Please feel free to contact us if we can be of any additional assistance.

Respectfully,

Otis Howe, Chairman

Terry Walker
Director

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