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October 25, 2021

Elissa Reaves, Director
U.S. Environmental Protection Agency
Pesticide Re-Evaluation Division
Office of Pesticide Programs
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-0001

**RE: EPA Draft Biological Evaluations for Clothianidin, Imidacloprid, and Thiamethoxam;
Docket ID # EPA-HQ-OPP-2021-0575**

Dear Dr. Reaves:

On behalf of the Agricultural Retailers Association (ARA), I am writing to provide comments on the draft biological evaluations (Bes) for imidacloprid, clothianidin, and thiamethoxam. Neonicotinoid insecticides, first introduced in the mid-1990s, have become an important tool used in the U.S. agricultural industry and largest selling insecticide class in the global marketplace.

Statement of Interest

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

Comments

Neonics are a modern class of insecticides that have been widely adopted by agricultural retailers and their farmer customers to manage some of the most destructive insect pests on crops. These products are being used in place of older insecticides because of their effectiveness against pest management programs and favorable environmental profile and mammalian safety.

Neonics are used on many crops such as soybeans, wheat, cotton, sorghum and canola. It is also used on many smaller-acreage horticultural crops, ornamental plants, lawns and even on pets for flea control. These pesticide products are extremely valuable for America's agricultural industry because of their use in integrated pest management (IPM) programs. Neonic insecticides help ensure beneficial insects remain available to keep other potential pests in check due to their selective control of target pests. If farmers were potentially forced to rely on older classes of chemistry it could result in reduced yields, more frequent sprays, higher costs, and less selective on types of pests impacted.

Pesticides are highly regulated products in commercial use, with over 120 different baseline studies required for new EPA registrations. These studies assess safety to humans, wildlife, and the environment. On average it takes around 11 years for a new product to be registered, sold and used in the U.S. marketplace. All pesticides, including neonics, are required to undergo periodic evaluation to ensure they continue to meet the highest standards of safety necessary to protect human health and the environment.

One of the most common uses for neonics is part of the seed treatments technologies to protect vulnerable seeds from threats of insects and diseases that exist in the soil during early developmental stages. Agricultural retailers provide seed treatment services for their farmer customers to deliver a very precise pesticide application that ensures the plant has a greater opportunity to grow a strong root system which is the foundation of a healthy, productive plant. Seed treatments also reduce the environmental impact on the crop production process by decreasing the necessary number of pesticide applications during the planting season and lessening potential exposures to non-target species, including humans and pollinators. Agricultural retailers, their farmer customers and other key segments of the industry are constantly evolving to improve seed treatment processes. Due to these technology advances, only milligrams of active ingredient are now used per individual seed.

ARA and our members work on collaborative solutions that will help to achieve a health population of honeybees and other pollinators in the context of productive agricultural operations. There is an extensive body of scientific research that definitively shows neonic insecticides are not linked to honeybee colony decline when the products are applied according to the directions on their EPA FIFRA approved label. For example, Australian honeybee populations are not in decline and neonics are regularly used in that country. The main threat to honeybees is the Varroa mite, a deadly parasite that lives on the outside of its host. The mite feeds on the brood and adult honeybees. When left untreated, honeybee colonies may die within months. This deadly parasite has spread to all inhabited continents except Australia. Many studies and field tests have followed the long-term health of colonies and found no adverse effects on survival, brood development or foraging behavior, under normal field condition use. Most scientists and experts agree that bee health is impacted by many factors, including parasites, disease, lack of proper forage and nutrition, weather, hive management practices, and pesticides when EPA's FIFRA approved label directions are not properly followed.

According to a 2017 report by the U.S. Department of Agriculture (USDA), honeybee populations are on the rise. According to USDA, as of April 2017 an estimated 2.89 million bee colonies existed across the United States, which is an increase of 3 % compared to April 2016. Globally honeybee colonies have increased 45% since the 1960s. U.N. Food and Agriculture Organization statistics show that the world's honeybee population rose to 80 million colonies from 2011 from 50 million in 1960.

The EPA's screening-level assessments found no real-world negative impact on birds and mammals from neonic insecticides from many years of widespread use. The agency's unreasonable assumptions of a negative impact were made under an unrealistic scenario of a 100% diet of a single feed item contaminated with the highest residues eating treated seed every day over its entire lifetime.

Modern planting equipment minimizes seeds remaining above ground that could be available for feeding. In addition, the agency's aquatic assessments found no issues with fish/amphibians, or aquatic and terrestrial plants. The agency's indication of potential risks is based on a laboratory study of a single sensitive species and not representative of real-world effects. The EPA assessments indicated no issues or concerns to human health.

ARA believes decisions by EPA and the U.S. Fish and Wildlife Services needs to be based on actual data and real-world situations that can be properly peer reviewed. Industry stakeholders should play a critical role in any sensible mitigation process to ensure they are realistic and achievable, while continuing to allow access to these critical insecticide products. ARA is willing to work with both EPA and U.S. Fish and Wildlife Services related to the sharing how these essential pesticide products are used by agricultural retailers on behalf of their farmer customers.

Thank you for your review and consideration of our comments!

Sincerely,

A handwritten signature in blue ink that reads "Richard D. Gupton". The signature is written in a cursive, flowing style.

Richard D. Gupton
Senior Vice President, Public Policy & Counsel