



August 28, 2020

Jonathan Williams
Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Via Regulations.gov: EPA-HQ-OPP-2020-0306

Dear Mr. Williams:

We are writing in response to the petition to revoke all food tolerance for neonicotinoid insecticides submitted by the Natural Resources Defense Council (NRDC). ASTA's mission is to enhance the development and movement of quality seed worldwide. ASTA's diverse membership consists of over 700 companies involved in seed production, distribution, plant breeding and related industries in North America. ASTA represents all varieties of seeds, including grasses, forages, flowers, vegetables, row crops and cereals.

Neonicotinoids and neonicotinoid seed treatments are an integral part of the integrated pest management systems used by farmers across a wide range of crops and are a favored method to protect seeds and seedlings from early season pests. We have participated as a commenter during EPA's extensive registration review process including preliminary risk assessments to address pollinators (2016-2017), aquatic (2017), and human health (2017), final pollinator risk assessments and Proposed Interim Decisions (PIDs) in 2020.

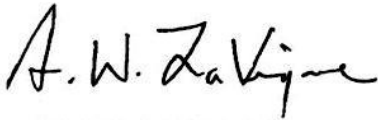
We note that EPA conducted human risk assessments including the Preliminary Human Health Draft Risk Assessment for Registration Review, Acute and Chronic Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for the Registration Review, and Imidacloprid Occupational and Residential Exposure Assessment for Registration Review were completed in 2017 and a 60-day period provided for public comment to these publications.

We commend EPA for following the established FIFRA process that guides pesticide registration and registration review for neonicotinoids. Thousands of pages of supporting materials were developed over many years leading up to the publication of the PID.

As part of the FIFRA review process, EPA also took the benefits of clothianidin, thiamethoxam and imidacloprid into account as required. EPA has recognized that the risks posed by seed treatments are low. ASTA feels that it is important to reiterate the benefits of seed treatment to modern agriculture to reinforce the risk-benefit decisions made by EPA. These benefits are both environmental and economic. Seed treatments allow for the precise application of pesticides to seed, reducing non-target exposure and environmental run off. Neonicotinoid seed treatments specifically, have increased yields, and improved crop quality. These economic benefits are extremely vital to supporting farm profitability as is the ability to better manage risks associated with soil borne pests.

The NRDC petition ignores the very thorough and robust EPA review that has included public and stakeholder input at multiple points throughout the process. Revocation of food tolerances for the neonicotinoids would have a tremendous negative impact on US agriculture and the seed industry. More importantly it would undermine the established processes in place at EPA. After years of uncertainty during the review process, our members are eager for neonicotinoid registration review to be completed in a timely way so they can proceed with their primary objective which is providing tools to American farmers so they can be as successful as possible.

Sincerely,

A handwritten signature in black ink that reads "A. W. LaVigne". The signature is written in a cursive, slightly slanted style.

Andrew W. LaVigne
President and CEO