



October 1, 2026

Chief Colton Buckley
USDA Natural Resources Conservation Service
1400 Independence Avenue
Washington, DC 20250

Re: Docket No. NRCS-2026-0100

Dear Chief Buckley:

The American Seed Trade Association (ASTA) welcomes the opportunity to submit comments on the proposed changes to the conservation practice standards in the National Handbook of Conservation Practices (Docket No. NRCS-2026-0100). Our nearly 700 members represent companies and researchers involved in the production, distribution, plant breeding, and related activities that comprise the supply chain, for every kind of seed (grasses, forages, flowers, vegetables, row crops, and cereals) and across every production system (conventional, organic, and biotechnology). Ninety-five percent of ASTA's active members are small businesses according to the Small Business Administration's categorization, while the total membership represents roughly 85% of all private seed companies operating in the United States. The strong representation across the forage, turf, and grass seed production supply chain enables ASTA to harness a variety of diverse perspectives to offer meaningful recommendations to improve the Natural Resources and Conservation Service (NRCS)'s delivery of conservation assistance.

The American Seed Trade Association appreciates the opportunity to provide comments on several of the proposed conservation practice standards.

595 -Pest Management Conservation System

ASTA appreciates the opportunity to provide information on treated seed and specifically recommendations on appropriate stewardship of the use of treated seed. ASTA partners with others in the agricultural commodity production chain -- Agricultural Retailers Association, American Soybean Association, CropLife America, American Farm Bureau Federation, National Cotton Council and the National Corn Growers Association -- to highlight these messages during planning season, [making sure stewardship practices are top of mind for producers using treated seed.](#)

We remain concerned that NRCS recommendations would be viewed as encouraging producers to not use treated seeds. ASTA appreciates the removal of the sentence "*Do not neonicotinoid [sic] treated seeds.*" However, recommendations to avoid or minimize the use of treated crop seeds remain concerning.

Farmers who use treated seeds may reduce the number of pesticide spray applications needed during the growing season, helping minimize chemical droplet drift, off-target pesticide movement, and volatile organic compounds emissions. As a result, humans and pollinators alike

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encounter less pesticides in the environment. Additionally, seed treatments selectively control insect pests and help ensure that beneficial insects remain available to counter other potential pests. Because some pests can damage the seed or seedling to the extent that there are no rescue treatment options available and the plants may either die or not produce a harvestable yield, seed treatments give farmers confidence that they are proactively managing early-season risk and minimizing the expense and environmental impact of replanting. Therefore, the use of treated seeds directly reduces the environmental impact of the crop production process.

Additionally, treated seeds help producers adopt other conservation practices. While cover cropping and no-till farming, for example, are important conservation practices, they can also increase pest pressure in some cropping systems because they increase plant residue in the field. In some cropping systems, pests use the residue for habitat and protection, enhancing their survival and reproduction outcomes.

Treated seeds provide an important first line of defense from soil born pests and disease through germination and emergence. By helping protect the developing seedling during its most vulnerable time, innovative seed treatments allow farmers to minimize plant pressure and decrease their impact on natural resources and non-target organisms. Producer access to multiple tools to create and execute pest management programs is important both for the farmer as well as for the environment.

NRCS added the following sentence that ASTA believes is unnecessary:

When including pesticide treated seed in the crop rotation, add a vegetative buffer strip between the planted seed area and adjacent lands.

The use of a vegetative buffer strip is not a requirement for the use of treated seeds and should not be included in the practice standard. NRCS has not documented the need for a buffer strip. ASTA recommends the removal of the sentence to add a vegetative buffer strip between the planted (treated) seed and adjacent lands.

The NRCS pest management environmental risk tool, WIN PST, does not include treated seeds. NRCS should evaluate updating or replacing the WIN PST tool with a more user-friendly tool to reflect the current on-farm practices, equipment, precision applications, and pest management tools used by farmers to assess potential environmental risk to be mitigated through conservation practices.

ASTA remains available for continued discussions on this issue and is pleased to make the stewardship guide to the use of treated seeds available for use in the practice standard and dissemination to field offices.

342 – Critical Planting Area
420 – Wildlife Habitat Planting
512 – Pasture and Hay Planting

ASTA appreciates the opportunity to provide comments on the three “planting” conservation practice standards that are open for comment through the Federal Register. The draft standards include important seed references to appropriate labels, testing and quality seeds, and compliance with federal and state seed laws for critical planting areas, wildlife habitat planting and pasture and hay planting. Each of these standards include three of the same sentences:

Seed must have a label or seed lab analysis which complies with federal and state seed laws, including germination, purity, and weed content. Seeding recommendations are based on pure live seed (PLS) to ensure the planting meets state implementation requirements for the practice and purpose. Seed will be free of federal or state prohibited noxious weed seed and meet any requirements for restricted noxious weed seed.

ASTA supports these three sentences and encourages NRCS to provide additional consistency across these standards to include the use of high- quality seeds to meet the conservation goals. ASTA recommends:

Use high- quality, professionally produced, resilient seed to meet conservation goals. Seed should be tested by an accredited and audited seed lab.

ASTA also supports the inclusion of references to certified seed and Pre-Variety Germplasm certification, as included in practice 342 – Critical Planting Area, and the reference to testing for seed purity and germination, as included in practice 420, Wildlife Habitat Planting.

While these three standards are being updated and are open for review, ASTA recommends that additional consistency in wording of the seed use in these “planting” practice standards be consistent across the individual standards.

Thank you for the opportunity to comment on these practice standards.

Sincerely,

A handwritten signature in black ink, reading "A. W. LaVigne". The signature is written in a cursive, flowing style.

Andrew W. LaVigne
President & CEO