

**NEW YORK ASSEMBLY STANDING COMMITTEE ON ENVIRONMENTAL CONSERVATION  
PUBLIC HEARING**  
SUBJECT: Neonicotinoid Pesticides  
*To examine the impact of neonicotinoid pesticides on pollinators and the environment.*

Albany, New York  
Monday, September 20, 2021  
11:00 a.m.  
Hearing Room C  
Legislative Office Building

**COMMENTS**

*Adam Robertson, Farm Seed Business Manager, Seedway LLC, Hall NY*

Chairman Englebright, thank you and the committee for the opportunity to present comments on the impact of neonicotinoid pesticides on pollinators and the environment. Neonics are a commonly used seed treatment. Seed treatments allow for the precise application of biological organisms, products and/or chemical ingredients to suppress, control, or repel plant pathogens, insects, or other pests that attack seeds, seedlings or plants. In a very efficient manner, they help a developing seedling during its most vulnerable time and allow today's farmers to do more with less, and to meet new and emerging challenges. Without seed treatments, like neonicotinoids, farmers would be forced to rely on a few, older classes of chemistry that are less selective.

According to *AgInfomatics* research, if neonicotinoids were not available:

- One pound of neonicotinoids would be replaced with nearly five pounds of other insecticides, resulting in an increase in application rate per acre of 375 percent and hundreds of millions of dollars in additional costs to farming operations; and,
- U.S. cropped land would increase between 340,000 and 410,000 acres to offset losses in yield and quality, much of which would come from the Conservation Reserve Program, environmentally sensitive land established to preserve water, soil and wildlife.

**Is neonic-treated seed necessary?**

- 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.
- Seed treatments enable earlier and faster planting; stronger, more uniform stands; optimal plant populations; and healthier plants that help increase productivity. 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.

**Do treated seeds impact the surrounding environment?**

- Technology is used to protect pollinators, including enhanced coating polymers and application processes to increase pesticide adherence to seeds, as well as new flowability agents that help minimize seed dust-off during planting. Industry is constantly evolving to improve seed treatment processes such as:
  - Using closed application systems and continuously improving mixing and drying processes to create a better application of active ingredients to the seed.
  - Implementing an ISO planting equipment standard to better control dust emissions.

- Even after regulatory authorities approve a pesticide for use, they continue to consider new information to assess the safety of registered products. And no pesticide's regulatory approval is permanent. In the U.S., the EPA routinely reviews registered products to determine if they should be renewed.
- As consumers ourselves, we fully support the comprehensive and science-based processes used by the EPA and other regulatory authorities around the world to ensure these crop protection tools can be used safely.
- The EPA carefully considers effects on many non-pest organisms when they approve new insecticides for use. Following the directions for use on the registered pesticide product labels, as well as the precautionary and instructional information provided on treated seed labels, mitigates exposure of the pesticide to non-pest organisms, including honeybees.

**Do farmers have options to buy non-neonicotinoid treated seed?**

- Farmers definitely have options for buying non-neonicotinoid treated seed. Growers make these decisions with their seed supplier, and companies plan their production and offerings accordingly.
- For certain crops, farmers who wish to purchase non-neonicotinoid treated seed will need to discuss their order in advance because seed companies begin production 9-12 months prior to planting.

**Seed treatment is an important practice of Integrated Pest Management (IPM) & Sustainability**

- IPM is "a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks." (*Source EPA*).
- In the case of seed treatment, either for soil dwelling pests or seedling pests it may not be possible to monitor the pest. However, the farmer can use other IPM tactics such as crop history, pest history and agronomic practices such as variety and planting dates as part of the overall IPM plan for the use of seed treatments.
- There are no rescue treatments for soil dwelling insects which is why farmers view neonicotinoid seed treatments as an important part of their pest management plan.
- Neonicotinoid seed treatments play a critical role in integrated pest management (IPM) programs, including less potential impact on beneficial insects in the field and decreased potential worker exposure. Such an IPM plan can be developed through monitoring fall crop yields, inspection for insect damage on harvested crop, soil sampling for soil born pests and reviewing weather data from the previous growing season.
- Neonicotinoid seed treatments selectively control insect pests, while helping ensure beneficial insects remain available to help keep other potential insect pests in check. This tool also provides a unique mode of action, necessary to managing pests resistant to other insecticides. Without neonicotinoids, farmers would be forced to rely on a few, older classes of chemistry that are less selective and more toxic.
- From a pest spectrum and resistance management perspective, having multiple tools for farmers' pest management programs is important both for the farmer as well as for the longevity of the tools.

We are confident that the full spectrum of challenges facing pollinators, including any pesticide interface, can be successfully managed through the use of best management practices, including practices designed within an integrated pest management program, rather than eliminating an entire class of pesticides.

Thank you. I appreciate the opportunity to comment and welcome any questions.