



April 20, 2018

Mr. Thomas Harty
Mr. Steven Snyderman
Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket Numbers: EPA-HQ-OPP-2008-0844, EPA-HQ-OPP-2011-0865, EPA-HQ-OPP-2011-0581

Dear Mr. Harty & Mr. Snyderman:

Thank you for the opportunity to comment on the registration review of Neonicotinoid pesticides imidacloprid, clothianidin and thiamethoxam, docket numbers: EPA-HQ-OPP-2008-0844, EPA-HQ-OPP-2011-0865, EPA-HQ-OPP-2011-0581. NAWG is a federation of 21 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research and sustainability.

Across the U.S., 43 million acres of wheat is harvesting at a value of over \$9 billion. Wheat producers face tough growing conditions, evidenced this year with an ongoing drought in the southern plains, and extreme temperature swings in many areas of the country. In addition to extreme weather, growers are expected to experience a 21% decline in net cash farm income. For wheat growers, having access to safe, affordable and effective crop protection tools is vital to producing a viable crop when confronted with weather conditions like those this year.

Wheat growers use neonicotinoid seed treatments for spring and winter wheat. Growers use of seed treatments in cereals is to guard against insect damage, like wireworm, and soil borne disease to help establish better, healthier root systems and stronger plant stands. Winter wheat is then better prepared with seed treatment use as the crop

enters dormancy in the fall and better able to survive harsh weather conditions. This technology is important to wheat growers that have determined that this is the most effective and appropriate tool to address the needs of their crop. A study of the Value of Neonicotinoids in North American Agriculture by AgInformatics found that without neonicotinoids, the increased cost per planted acre was \$2.76 for winter wheat and \$1.97 for spring wheat using alternative chemistry. The cost increase of wheat production if neonicotinoids were not available would include an increase in pesticide applications, crop scouting, and higher seeding rates, not to mention growers' management time.

Seed treatments offer NAWG members an economical and efficient means for protecting their wheat seed from damage from early-season seed-borne and soil-borne insects, pests, pathogens and diseases. Using seed treatments reduces the need for expensive chemistry rescue treatments (if available) and/or replanting a failed wheat crop if the pest outbreak was not controlled. Wheat seed is particularly susceptible to numerous types of smut, a fungal disease that infects cereal grain, resulting in loss of yield and quality. Seed treatments have proven to be effective in controlling smut, allowing growers to maximize yield and produce higher quality grain. Treated wheat seed with neonicotinoids are better protected against seed-borne diseases, Pythium infection, dry seed decay, early season foliar diseases, aphids, early season Hessian fly and wireworm than other alternative seed treatment chemistries. For some destructive insects such as wireworms, there are no alternative products for wheat growers. Neonicotinoid seed treatments are the only labeled product for wireworm control in wheat. Wireworm is an insect pest common to the Pacific Northwest growing region, and periodically present in other wheat growing regions. A photo of the damage wireworms can do to a wheat field in Washington State is attached (photo from Washington State University).

NAWG members understand the importance of proper use and management of treated seed. NAWG joined with the American Seed Trade Association and other commodity organization in spreading the message of stewardship of treated seed. Our joint publications remind growers to follow label directions, eliminate weeds, minimize dust, be aware of honey bees and hives near fields, and clean planting equipment, remove leftover treated seed and dispose of properly. NAWG is also encouraging our members to manage any seed spills appropriately by being aware of when and where seed spills are likely to occur and to clean or cover up seed spills immediately. These stewardship efforts protect wildlife and beneficial insects like bees near seed storage and during the planting season.

NAWG is concerned that EPA assessments are overly conservative and do not represent real-world risks. Risk decisions should not be based on highly conservative risk assessments. Further refinements in the assessment are necessary to better represent the real-world situations encountered by wheat growers that should be measured against the benefits of neonicotinoid products. NAWG and other grower

organizations are involved in outreach and education of growers which emphasize the proper stewardship of neonicotinoids in treated seed that is designed to minimize risks to wildlife.

As EPA continues the review of neonicotinoids, if mitigation measures are to be implemented with the future use of these products, we ask that growers should be consulted as you develop any mitigation procedures. NAWG supports the continued use of neonicotinoids by wheat growers under stewardship protocols and label guidelines that are realistic and sensible, while still protecting the environment in which their use occurs.

Thank you for the opportunity to comment on these important products.

Sincerely,

A handwritten signature in blue ink that reads "Jimmie Musick". The signature is written in a cursive, flowing style.

Jimmie Musick
President
National Association of Wheat Growers

