



May 4, 2020

Mary Reaves
Acting Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW,
Washington, DC 20460-0001

RE: Docket Number EPA-HQ-OPP-2011-0865-1161

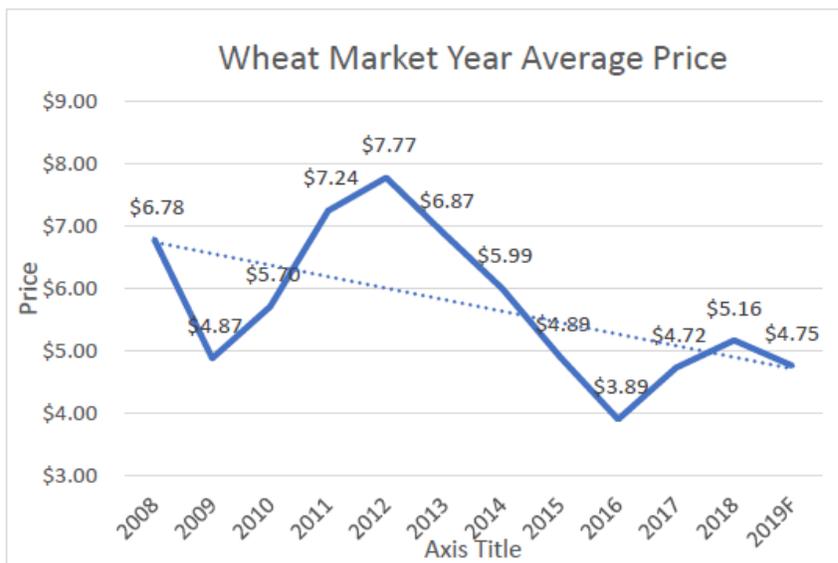
Dear Acting Director Reaves:

Thank you for the opportunity to comment on the Proposed Interim Decision for Imidacloprid (Docket Number EPA-HQ-OPP-2011-0865-1161). The National Association of Wheat Growers (NAWG) is a federation of 20 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.

Imidacloprid and other treated seeds provide wheat growers the ability to protect their crop from early season pests, pathogens and diseases. Using a treated seed allows for protection of the seed and plant and reduces the need to treat the crop later in the season. The use of this crop protection tool is balanced with the threat of crop damage, environmental impacts and economics of treatment vs. crop damage from no treatment. Growers also take other factors into consideration before using any crop protection product including their crop rotation, weed and pest pressure and efficacy and cost.

Wheat growers understand the importance of following safety precautions and requirements set out by EPA and State Agencies. Any pesticide is used only when

necessary to ensure the viability of the crop and the decision to apply pesticides or use treated seeds must be economically viable considering all the costs of production and the expected price received for the harvested crop. These considerations are at the forefront of wheat growers' mind due to several years of continuous low commodity prices. Over the last 10 years, the drop in commodity prices have been much faster than the change in cost of production. The expectation of continued low prices has contributed to some of the lowest wheat acreage in the U.S. in history.



Source: <https://quickstats.nass.usda.gov/>, *(P)= projected value by USDA

Despite declining acreage, U.S. wheat growers are continuing to produce more wheat per acre. Our ability to keep producing high quality wheat for domestic and international markets is due to the seed varieties and crop protection tools that are available to US growers. These technologies, including seed treatments, protect the plant from pests and disease and allow for a healthy crop. Crop protection tools are vital to our ability to produce a wheat crop to meet consumer demand for wheat food products.

Wheat growers use imidacloprid to protect against wireworms and other pests. Wireworm infestations can destroy wheat fields and growers need to have different pesticide options available to them to provide treatment to ensure a successful crop. Treated seeds are currently the only EPA approved pesticides for wheat growers to use against wireworms. Wheat growers also use neonicotinoids also treat aphids and Hessian flies.

Wheat growers are concerned about the EPA's decision to remove the ability for farmers to treat seeds on-farm and asks the EPA to reconsider this approach. NAWG members believe EPA's approach overestimates exposure and does not take into

consideration modern farming equipment that limits farmer contact with crop protection products and is not reflecting product formulations used on wheat seeds. NAWG understands that additional data has been submitted to the EPA through the Agricultural Handlers Exposure Task Force to reflect the use of liquid based formulations as opposed to the powder based formulations used in EPA's current assumptions. This additional information should be reviewed and a further understanding of wheat growers' actions when treating seeds should be considered.

A mitigation requirement to prohibit on-farm seed treatment will also have an adverse economic impact on wheat growers that are using different brands of products to treat seeds. The ability for a farmer to treat their own seeds on-farm works to keep treated seeds price competitive and enables access to different brands of products. NAWG members are concerned that without the ability to treat seeds on-farm wheat farmers' options will be limited, resulting in higher prices to the farmers when they are already facing falling commodity prices and increasingly uncertain market conditions. NAWG requests that EPA reconsider the prohibition on on-farm treatment of wheat seeds. NAWG would be happy to work with you to further understand on-farm practices and equipment to ensure that wheat growers can safely treat wheat seeds on-farm.

NAWG members adhere to state requirements and pesticide applicator certifications, undergoing training and educational programs on the safe handling of products, personal protection equipment and what do in case of a seed spill. Many growers hold pesticide applicator licenses from their state regulatory agency and on-farm seed treatment should be permitted under these licenses. NAWG also works with the American Seed Trade Association to distribute information on stewardship of treated seeds to our member state associations and growers. Growers understand the proper handling, stewardship and disposal of treated seeds is required to safely use these products.

NAWG requests that certain areas of the PID be clarified, specifically the wording on droplet size and vegetative buffer requirements. While wheat growers' use of imidacloprid today is through treated seeds, we believe the language in this document should provide clear direction to farmers. Section 9 addressing spray drift and runoff reduction reference to a vegetated buffer requirement is for all agricultural uses (page 52), while the proposed label in Appendix B specifies that the vegetated buffer requirement is specific to foliar applications. The text on page 52 of the PID should be modified for specific references to foliar applications, not all agricultural uses. Additionally, NAWG recommends the references to droplet size be modified to state nozzle size instead of droplet.

Thank you for the opportunity to comment on the Proposed Interim Decision for Imidacloprid.

Sincerely,

A handwritten signature in blue ink that reads "David Milligan". The signature is written in a cursive style with a horizontal line underneath it.

David Milligan
President
National Association of Wheat Growers