

September 23, 2024

Jan Matuszko
Director
Environmental Fate and Effects Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides (EPA-HQ-OPP-2024-0299)

Dear Ms. Matuszko,

Thank you for the opportunity to provide comments on the Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides (EPA-HQ-OPP-2024-0299) hereafter “Draft Insecticide Strategy”. The National Association of Wheat Growers (NAWG) is a federation of 20 state wheat grower associations and industry partners 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 works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research, and sustainability. We have worked quickly to gather input on the Draft Insecticide Strategy and its effect on our growers. NAWG believes that we must continue to engage in the process to ensure the Environmental Protection Agency (EPA) finalizes a strategy that fulfills the agency’s obligations under the Endangered Species Act (ESA) and does not jeopardize our growers’ livelihoods and farming operations.

Each year, wheat growers face challenges ranging from economic to weather, and growers are incentivized to properly care for and manage their inputs when operating with tight margins. Insecticides are a valuable tool growers use to protect their crop from damaging pests. NAWG is concerned with the various restrictions within the Draft Insecticide Strategy proposed in the lower 48 states. This strategy includes a multitude of hurdles that would significantly limit insecticide application throughout the United States. NAWG understands the pressure that EPA is facing in upholding its ESA requirements. However, it is important that regulators, stakeholders, and producers come together to find a feasible solution that ensures a strong agriculture industry. The mitigation measures and buffer requirements proposed within the Draft Insecticide Strategy must be reconsidered as they pose a severe threat to wheat growers and agriculture producers. Using feedback from growers and stakeholders is the best tool to properly improve the proposed Draft Insecticide Strategy.

NAWG appreciates the work that EPA has done with the comments submitted regarding the Draft Herbicide Strategy. EPA took into account stakeholders' concerns with the mitigation menu for the Draft Herbicide Strategy and altered the menu for a more reasonable and attainable system for producers when creating the Draft Insecticide Strategy. The mitigation menu for the Draft Insecticide Strategy shows improvements compared to its previous counterpart. However, some issues within the Draft Insecticide Strategy are causing concern among NAWG members. NAWG has concerns with the practicality of the implementation of the field scoring system presented in the Final Herbicide Strategy and the Draft Insecticide Strategy. With growers having several fields, often growing different crops, these fields might score differently and have different mitigation measures. The time needed to factor in different scenarios in each field is a laborious and inefficient way to calculate a final score on one's field. The time allocated to scoring is economically burdensome to an individual farmer, as farmers are already tasked with managing their operation.

The economic stress of the Draft Insecticide Strategy mirrors the same concern our growers had towards the Draft Herbicide Strategy. The mitigation menu has shown improvement on the Draft Insecticide Strategy. However, these mitigation options listed on the menu still draw considerable concern from our growers as they are economically infeasible for our farmers to utilize. Buffer distance, as defined in the Draft Insecticide Strategy, is the determining factor when considering the mitigations a grower might need for their given field. Buffer distances vary depending on the level of mitigation required; however, the buffer can range anywhere from 0-500 feet depending on insecticide application. Some of the buffer mitigations offered are not feasible for our growers. Buffer mitigations include downwind windbreaks, riparian, hedgerow, forest, shrubland, and woodlots. With a vast majority of wheat grown in semi-arid areas, these buffer mitigations are either infeasible for our growers to utilize or will incur an immense economic cost to their operation. EPA's evaluation of pesticide runoff/erosion vulnerability has significant differences and variations for our wheat producers. Depending on which side of the country our growers farm, producers could see anywhere from 0-6 points of relief from their original mitigation score assessment. Our western growers face extremely dry conditions, and this relief system is a necessary aid for our Pacific Northwest and High Plains producers. However, with this score relief, some growers in these regions might still be left with high field scores and unachievable expectations for mitigation measures. This runoff/erosion relief system is an excellent start but might not provide enough assistance for our growers in dry and tough areas. Furthermore, growers in the East and Midwest are left with little to no mitigation relief from their original score. The EPA must reassess counties with high levels of runoff vulnerability to ensure precise scoring. With precise scoring, this might provide further alleviation from the grower's mitigation score, resulting in less economic damage to producers.

Aside from buffers, growers need to utilize several of the mitigations from the menu depending on the scoring of their fields. There are mitigations available. However, there are some additions for certain cropping systems that should be included in the Final Insecticide Strategy.

The Draft Insecticide Strategy references cover crops and double cropping as possible mitigation points for growers in reducing exposures from runoff/erosion. Those are important mitigation options, but we would encourage EPA to expand or create a new category for crop rotations. In many areas, farmers use diverse crop rotations to keep the ground covered throughout most of the year, and they may not precisely fit within USDA double cropping definitions/identified areas. Double cropping is typically identified for [soybeans and sorghum](#), but not more broadly for small grains and other crops. Crops such as wheat can break pest cycles for pests and diseases, providing added benefits for cropping systems and reducing the need to use crop protection tools. These benefits of wheat in rotations are documented in *Beyond grain: Agronomic, ecological and economy benefits of diversifying crop rotations with wheat* <https://www.sciencedirect.com/science/article/pii/S0065211324000312>.¹

Wheat residues and harvesting wheat in a manner that leaves additional residue on the field is an interim conservation practice that the Natural Resources Conservation Service is currently reviewing in several states (Conservation Harvest Management <https://efotg.sc.egov.usda.gov/api/CPSFile/42933/>). The higher residue retains more moisture in dry climates and provides similar benefits to a cover crop where the timing of harvest and climate does not allow for the establishment of a traditional cover crop. Wheat residue provides a habitat for ground-dwelling birds, protects the soil from erosion, and controls weeds. We encourage EPA to include these added benefits of wheat residue in the mitigation options for producers.

Insecticide usage is such an essential component in maintaining a grower's operation. There is a multitude of pests that can damage or decimate a harvest during the growth stages. To name a few, growers must deal with Aphids, Cereal Leaf Beetle, Grasshoppers, and Wireworms, which, if present, can cause devastating damage to their crops and their land. These pests are not just a burden on wheat but can have an immense impact on the entirety of the crop industry. Aphids cause significant damage to crops by transferring viruses like the barley yellow-dwarf virus among cereal grains and can lead to yield loss among a multitude of crops. The viability of an operation is reliant on a successful crop year for our producers. If pest management is not an available crop protection tool, the likelihood of our growers being able to sustain a successful harvest is immensely decreased. Limited crop protection tools can tip the scales and lead to grower's economic costs outweighing economic benefits. Being issued additional hurdles with the Draft Insecticide Strategy limits our grower's success in growing and harvesting a bountiful crop. Without a crop to harvest, economic uncertainty would gravely impact our producers.

Wireworms are a significant concern in the Pacific Northwest regions and greatly damage young seedlings and germinating seeds. The larvae can remain in this immature stage for several years feeding on seedlings. Aside from damage to the crop, their presence also results in increased weed pressure. This damage would cause escalated economic loss and more laborious

¹ [Beyond Grain Agronomic](#)

maintenance for growers who are directly affected. Treated Seeds are an insecticide solution for wireworms, and without this pest management product, growers have no solution to this ever-growing problem. If growers cannot manage all the guidelines that are accompanied by the Draft Insecticide Strategy, then insecticide usage will be limited depending on that product. This is concerning for NAWG because this decrease in the usage of crop protection tools will lead to an economic loss for the wheat industry.

The economic loss that could occur by the limitation of insecticide products could be enormous if revisions are not made to the Draft Insecticide Strategy. It is crucial to protect our crops, as insects, if left untreated, can cause anywhere from \$25 - \$75 million dollars of crop damage to the wheat industry per state if growers do not have proper access to insecticides. A study from Washington State University highlighted that armyworms caused up to 35% yield loss on spring wheat trials showcasing the magnitude of damage insects have on a wheat crop.² South Dakota State University highlighted that wireworms can wipe out 80% of a wheat crop if proper insecticide seed treatment is not used.³ If growers cannot utilize approved crop protection tools because they have to prioritize the mitigation measures outlined in the Draft Insecticide Strategy it establishes a system that ultimately damages our grower's ability to produce. The decrease in production could also threaten food security as the United States is a major wheat exporter. If pests eliminate a vast majority of our nation's wheat, we could further contribute to global food insecurity, which will also hinder our national security.

NAWG appreciates EPA's efforts and thanks them for the opportunity to comment on the Draft Insecticide Strategy. The draft strategy shows improvements from its previous counterpart. However, there are a couple of factors that the EPA must consider when finalizing the Draft Insecticide Strategy. The EPA needs to refine the Draft Insecticide Strategy's risk assessment process. The point system and mitigation measures in the Draft Insecticide Strategy are too time-consuming and difficult for our growers to undertake. The EPA needs to work closely with the crop protection user community and the state regulatory groups to help assess grower's operations and aid in mitigation planning for growers. Future engagement with grower communities and educative sessions are necessary to properly roll out the ESA Workplan in a manner that works for producers. Currently, growers are put under extensive responsibility to ensure they comply with the guidelines of this strategy. The EPA should provide a reasonable pathway to allow growers the ability to produce a safe and viable crop. If insecticide usage is limited due to the Draft Insecticide Strategy, then how does the EPA expect producers to protect their farmland from pests? The mitigation measures proposed must be designed in a less onerous fashion for our growers to utilize. Conservation programs are another factor the EPA must consider when evaluating the Insecticide Strategy. Wheat growers utilize conservation methods and should be recognized for these environmentally friendly practices. Adding more conservation practice options within the mitigation menu is going to be a necessary step to make the ESA compliance process more attainable for producers.

² [WSU Wheat and Small Grains Extension](#)

³ [SDSU Extension Insect Pests of Wheat](#)

NAWG acknowledges the work that EPA is doing to come into compliance with ESA regulations. However, there are a multitude of overly conservative policies and base assumptions in the document that result in infeasible barriers for producers. These overly conservative assumptions will create unworkable mitigations with no concrete benefit to the environment or the listed species. Furthermore, education and additional resources to state crop advisors, extension agents, and state departments of agriculture will all be necessary to educate and efficiently operate the Draft Insecticide Strategy properly. As the agency moves forward in the registration process, the EPA must consider these concerns to structure the framework of the Final Insecticide Strategy correctly.

Thank You,



Keef Felty
President
National Association of Wheat Growers