



**NATIONAL ASSOCIATION
OF WHEAT GROWERS**

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July 20, 2026

The Honorable Lee Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Draft Fungicide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Fungicides (EPA-HQ-OPP-2026-2973)

Dear Administrator Zeldin:

The National Association of Wheat Growers (NAWG), which represents wheat farmers across the United States, appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) Draft Fungicide Strategy. Wheat growers share EPA's commitment to protecting endangered species and recognize the Agency's responsibility to implement the Endangered Species Act (ESA) in conjunction with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). As an organization representing wheat farmers across the United States, NAWG supports science-based conservation efforts that achieve meaningful environmental outcomes while preserving farmers' ability to grow food, fiber, and fuel.

While NAWG supports the Agency's goals, we are concerned with certain aspects of the Draft Fungicide Strategy that may impose significant operational and economic burdens on wheat growers. Fungicides are essential tools used by wheat growers to protect yield and grain quality from fungi growth on wheat. Many of the proposed mitigation measures could limit growers' ability to effectively manage fungal disease pressure during critical stages of crop development. NAWG encourages EPA to continue refining the Draft Fungicide Strategy to ensure that mitigation measures are practical, science-based, and reflective of modern agricultural practices.

Fungicides are among the most important crop protection tools available to wheat farmers. Wheat can be vulnerable to many fungal diseases that can significantly reduce yield, lower grain quality, and hurt farm profitability. Diseases such as stripe rust, leaf rust, tan spot, and Fusarium head blight can spread quickly under the right environmental conditions. They require timely intervention to prevent substantial economic losses. Unlike other crop protection decisions, fungicide applications typically occur within narrow windows when disease pressure and crop growth stage align. Missing these application windows reduces fungicide efficacy and can increase the likelihood of crop damage. The Draft Fungicide Strategy should acknowledge the unique timing and other disease management challenges that are associated with growing wheat. Mitigation measures that appear reasonable on paper may create significant practical difficulties when implemented by wheat farmers across the country.

NAWG is particularly concerned about the potential impact of the spray drift buffer requirements proposed under the Draft Fungicide Strategy. While growers are already taking measures to minimize drift and off-target movement, excessive buffers may create unintended consequences for wheat farming. Large ‘no-spray’ zones can leave productive acres vulnerable to devastating disease pressure. On wheat farms, untreated areas can become hotspots for disease, reducing the effectiveness of crop protection efforts across the entire field.

The economic implications of excessive buffers also should not be underestimated. Wheat growers already operate in highly competitive global markets and are facing stubbornly high input costs. Any reduction in effective disease control threatens to lower yields and reduce grain quality. Large buffers may also create operational challenges for applicators and growers. Most farm fields are irregularly shaped and located adjacent to various different habitats. In these cases, required buffers may substantially reduce the treatment area or make application patterns more complex, resulting in increased costs, reduced efficiency, and poor-quality grain. NAWG encourages EPA to ensure that buffer requirements outlined in the Draft Fungicide Strategy are based on demonstrated risk and account for available technologies and practices that effectively reduce spray drift.

Wheat growers and applicators have invested heavily in technologies and management practices designed to minimize off-target movement and improve application precision. Modern application equipment allows growers to make more targeted and efficient pesticide applications than ever before. Common drift-reduction practices include drift-reduction nozzles, larger droplet sizes, weather monitoring tools, precision application systems, and drift-reduction adjuvants. Applicators routinely monitor wind speed, temperature, humidity, and other environmental conditions before making applications and follow label requirements and stewardship recommendations to reduce drift potential. In addition to technological improvements, wheat growers participate in extensive training and stewardship programs that emphasize federal law, safety protocols, authorized pesticide use and environmental protection. These efforts have contributed to significant improvements in application accuracy and reductions in off-target movement over time.

NAWG strongly encourages EPA to ensure that mitigation measures already identified within EPA’s mitigation frameworks are consistently and predictably credited across all pesticide strategies and implementation tools. When growers adopt practices that EPA has determined will reduce exposures such as drift-reduction technologies, application practices, and stewardship measures, those practices should reliably translate into clear and meaningful mitigation credit, including appropriate reductions in buffer requirements or other regulatory obligations. Inconsistent application of mitigation credit undermines the value of these tools and creates uncertainty for growers making pest management decisions. This consistency is particularly important for wheat farmers, as fungicide applications are often made during narrow treatment windows to manage disease. Uncertainty in how mitigation measures will be credited can limit the practical usefulness of tools that EPA has already identified as effective in reducing spray drift.

NAWG also encourages the EPA to provide clarity on the role of adjuvants within the Draft Fungicide Strategy. Wheat growers routinely use a range of adjuvants that work to improve spray performance and reduce off-target exposure. NAWG urges EPA to establish a clear, science-based, and timely process for recognizing adjuvants and drift reduction technologies that reduce exposure risks, rather than limiting recognition to a narrow or static set of products. Innovation in application technology continues to advance rapidly, and EPA's mitigation framework should be flexible enough to incorporate new tools as they become available. Providing timely and predictable pathways for recognition of new mitigation measures will encourage continued innovation while helping growers meet both environmental protection goals and the practical realities of raising wheat.

NAWG is concerned that the risk profile of fungicide-treated seed is not clearly distinguished from higher-exposure pesticide application methods. Treated seed is an essential disease management tool for wheat farmers providing targeted, early-season protection against seed- and soil-borne pathogens. This protection is especially important during wheat's early growth stages when seedlings are most vulnerable. Fungicide-treated seed delivers significant agronomic and environmental benefits by reducing reliance on in-season fungicide applications. By protecting plants at germination, seed treatments minimize exposure relative to broadcast or foliar applications, decreasing the number of field passes required for crop protection. These reductions translate into a reduced potential for off-target exposure associated with fungicide applications. NAWG is concerned that the Draft Fungicide Strategy does not fully account for these exposure reductions when considering potential mitigation pathways.

NAWG strongly emphasizes the importance of maintaining flexibility within seed treatment systems, including both commercially treated seed and on-farm treated seed practices where applicable. Wheat growers rely on this flexibility to respond to variable disease pressure, localized agronomic conditions, and rapidly changing environmental and market conditions. Any additional regulatory requirements that limit access to treated seed technologies would risk reducing wheat growers' ability to effectively manage disease.

NAWG is concerned that the Draft Fungicide Strategy may not sufficiently distinguish between theoretical exposure and real-world field conditions. When planted, treated wheat seed is incorporated into the soil, where fungicide active ingredients bind to seed coatings and soil particles, significantly limiting mobility and reducing potential exposure to non-target organisms. This is especially true for wheat grown in the U.S under dryland conditions, where growers regularly practice deep seeding to ensure water availability. NAWG urges EPA to ensure that exposure assumptions for treated seeds are grounded in realistic agronomic conditions.

NAWG also encourages EPA to carefully evaluate whether additional treated seed mitigation measures are necessary, given the extensive stewardship framework already in place. Modern planter technology, including improved seed delivery systems and products like TreatSafe, a dust reducing agent, significantly improves planting accuracy and reduces dust-off, further limiting potential exposure. These advancements are widely adopted by wheat farmers and already function as practical risk reduction strategies. Wheat growers and the broader seed industry have also implemented robust stewardship programs to ensure responsible use of fungicide-treated seed. Industry resources such as the Seed Treatment Guide and the Growing Matters stewardship

program provide detailed, widely adopted guidance on safe handling, planting, and disposal practices designed to minimize environmental exposure and protect non-target organisms. These programs reflect an effective stewardship system that should be recognized in EPA's mitigation framework. NAWG is concerned that layering additional mitigation requirements on top of this existing system could create unnecessary complexity and undermine the utility of treated seed technologies. EPA should recognize existing stewardship programs, best management practices, and technological improvements as effective mitigation measures within the Draft Fungicide Strategy to avoid duplicative requirements that do not reflect real-world agricultural conditions.

Additionally, NAWG is concerned that the assumptions made in the Draft Fungicide Strategy regarding in-field species presence and exposure may not adequately reflect the realities of modern wheat farming. NAWG encourages EPA to evaluate assumptions regarding the presence and frequency of listed species occupancy within these agricultural areas. Exposure scenarios based on broad assumptions of species presence may overestimate actual risks and could lead to unnecessary mitigation requirements that provide limited environmental benefit and impose substantial burdens on wheat growers.

NAWG is particularly concerned that the Draft Fungicide Strategy may rely on assumptions that do not fully account for the characteristics of fungicide use or the agronomic conditions present on wheat farms. Fungicides are frequently applied only when disease pressure warrants treatment and within narrow application windows to protect crop yield and quality. Restrictions based on theoretical in-field exposure could significantly limit growers' ability to respond to economically damaging diseases without necessarily resulting in improvements for listed species. Wheat fungicide applications are generally confined to short periods, while the nesting periods of species such as the horned lark and greater sage-grouse span much broader seasonal windows. As a result, assumptions that treat these entire nesting periods as overlapping with fungicide applications may overstate the duration and likelihood of potential exposure. More refined analyses would better reflect actual use patterns while maintaining protections for listed species.

NAWG encourages EPA to continue refining species mapping tools, exposure models, and assumptions regarding species occupancy using the best available science and data whenever possible. The EPA should ensure that mitigation measures are targeted toward circumstances where true risk exists rather than relying on generalized assumptions. Improved species distribution data and more refined exposure assessments will help ensure that conservation efforts are directed where they can provide the greatest value. NAWG also encourages EPA to recognize the numerous conservation practices already employed by wheat growers that reduce potential exposure. Practices such as no-till, cover crops, residue management, grassed waterways, filter strips, and participation in USDA conservation programs provide environmental benefits while supporting regenerative wheat farming. These existing practices should be recognized as important risk modifiers within the Fungicide Strategy and incorporated into flexible mitigation pathways.

NAWG appreciates EPA's efforts to develop a national framework for ESA compliance and recognizes the importance of protecting endangered and threatened species. Wheat growers are committed to responsible stewardship and are willing partners in conservation efforts. However, successful implementation of the Draft Fungicide Strategy requires a balanced approach that

recognizes both environmental goals and the practical realities of growing wheat. EPA should ensure that mitigation requirements are flexible, science-based, and economically feasible while preserving access to the crop protection tools necessary to maintain productive and sustainable wheat farms.

NAWG looks forward to continuing to work with EPA to develop practical solutions to protect endangered species while supporting wheat growers and the safe, affordable, and abundant food they provide.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Kieffer", with a stylized flourish at the end.

Samuel A. Kieffer,
Chief Executive Officer