National Barley Growers Association

August 28, 2020

Jonathan Williams, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Petition to Revoke all neonicotinoid tolerances; Docket ID EPA-HQ-OPP-2020-0306

The National Barley Growers Association (NBGA) writes to submit comments regarding the Natural Resources Defense Council petition to revoke all tolerances for neonicotinoid pesticides (acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam) on raw agricultural commodities. NBGA is a non-profit commodity organization that works to promote the national and international interests of U.S. barley growers.

The NBGA previously submitted comments on the respective registration review cases for imidacloprid, clothianidin, and thiamethoxam. It is important that the registration review process is completed in a timely manner and in compliance with the FIFRA statute. EPA has completed human health risk assessments and had two open comment periods to allow the public feedback to the Agency.

- Neonicotinoid registration review was initiated in 2008 and to date EPA has performed extensive work to publish preliminary risk assessments to address pollinators (2016-2017), aquatic (2017), and human health (2017) which were followed by final pollinator risk assessments and Proposed Interim Decisions (PIDs) in 2020 as part of the final registration review.
- Human risk assessments included the Preliminary Human Health Draft Risk Assessment for Registration Review, Acute and Chronic Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for the Registration Review, and Imidacloprid Occupational and Residential Exposure Assessment for Registration Review were completed in 2017 and a 60-day period provided for public comment to these publications.
- Crop-specific benefits and economic impact analyses were performed by OPP-BEAD to support registration review and published in 2014 and 2017, followed by the EPA publication of eight crop-group use, benefits, and mitigation assessments in 2019 and 2020.

As indicated in our previous comments, neonicotinoids are some of the most effective insecticides used by barley growers to manage early season damage caused by wireworms to germinating seeds or seedlings. A large wireworm can kill two or more seedlings by feeding on germinating seeds and burrowing into stems. An infested field is likely to simultaneously contain wireworms at all growth stages and can cause stand reductions resulting in reduced yields. The only way to treat for wireworms is through seed treatments as there are no effective foliar insecticides available to treat a wireworm infestation in an emerged crop. It takes three to

four years for wireworms to reach adulthood, and once a field is infested, treatment is required annually to manage wireworm populations.

Many producers have adopted reduced tillage or no-till practices to prevent erosion, while others have increased use of cover crops to improve soil health, nutrient sequestration and water quality. However, these conservation practices can also result in an increase in many soil insects including wireworms.

Barley producers value the use of neonicotinoids such as imidacloprid, clothianidin, and thiamethoxam as part of integrated pest management (IPM) programs, as they provide a unique mode of action and help to manage pests resistant to other pesticides. In addition, by allowing producers to have another option in combatting insects and rotating different products, farmers can help prevent resistance from occurring in the first place. This can also help reduce overall pesticide use by maintaining effectiveness of the products.

While evaluating the importance of the availability of treatments that contain neonicotinoids, it's important to also evaluate any unintended consequences that would result from limiting or eliminating these products. The loss of neonicotinoids would force producers to use more expensive, less effective tools to combat pests. Not only would it cost more, but producers would often have to switch to older, less effective products and increase the amount of pesticides applied to crops. It's estimated that it would take 5 pounds of older chemicals to replace every 1 pound of neonicotinoids. The neonicotinoid class of insecticides is also less toxic to birds and mammals, when compared to organophosphate and carbamate insecticides. In addition, without the availability of these effective seed treatments to protect against soil pests, we could see an increase in tillage resulting in more soil erosion, run-off and loss of wildlife habitat.

The NBGA urges EPA to continue using science-based decision-making in evaluating neonicotinoids and urges the Agency to use the overwhelming data that supports the continued registration of neonicotinoid seed treatments.

Sincerely yours,

Milo "Buzz" Mattelin
President, National Barley Growers Association