



## **Kansas Agribusiness Retailers Association**

### BY ELECTRONIC MAIL

Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Docket ID Nos: EPA-HQ-OPP-2020-0306

Federal eRulemaking Portal: <http://www.regulations.gov>

August 26, 2020

**Re: Docket ID Nos. EPA-HQ-OPP-2020-0306, EPA Notice on Petition to Revoke All Neonicotinoid Tolerances and Comments Regarding Dietary Exposure.**

The U.S. Environmental Protection Agency (EPA) is seeking public comment on a petition by the Natural Resources Defense Council (NRDC) requesting EPA to revoke all tolerances for residues of neonicotinoid pesticides (Imidacloprid, Clothianidin, Dinotefuran, Acetamiprid, and Thiamethoxam), on the alleged basis that the analysis supporting the tolerances is flawed and the tolerances are unsafe for the American population.

Kansas Agribusiness Retailers Association (KARA) is a voluntary trade association whose membership includes over 700 agribusiness firms that are primarily retail facilities supplying fertilizers, crop protection chemicals, commercial application services and seed to Kansas farmers. KARA serves as a representative voice for the agribusiness industry to its members, the public, and government, and is committed to professional development and business viability for the plant nutrient and crop protection industry. As such, KARA submits these public comments.

Kansas is a leading producer in agricultural crops. Many KARA members register pesticide products for sale in Kansas and sell herbicide products to farmers. Regulatory actions affecting the sale of inputs and crop protection products utilized in growing those crops affect our members' ability to serve Kansas farmers.

Neonicotinoid pesticides (neonics) are a modern class of insecticides that have been widely adopted to manage some of the most destructive insect pests on crops. Neonics are used on many crops such as soybeans, wheat, cotton, sorghum, and canola. They are also used on many smaller-acreage horticultural crops, ornamental plants, lawns and even on pets for flea control. These pesticide products are extremely valuable for America's agricultural industry because of their use in integrated pest management (IPM) programs. If farmers were potentially forced to rely on older classes of chemistry, this could result in reduced yields, more frequent sprays, higher costs, and reduced spectrum of pests impacted.

Use of neonics in seed treatments reduces the environmental impact on the crop production process by decreasing the necessary number of pesticide applications during the planting season. Seed treatment also decreases potential exposure to non-target species, including humans and pollinators. The agricultural industry is constantly evolving to improve seed treatment processes. Due to these technological advances, only milligrams of active ingredient are used per individual seed.

Compared to other insecticides, neonicotinoids are more selective, allowing for the preservation of beneficial insects, which are a key element of IPM programs. Neonicotinoid products are very effective against certain types of insects and would be replaced with older, less selective products that would negatively affect beneficial insects, reduce yields, and lead to more frequent and costly applications of insecticide products.

Under the petition, NRDC claims that existing residue tolerances for the neonicotinoids listed above are unsafe and must be revoked due to flaws in EPA's analysis. To that argument, we respond as follows:

- Pesticides are highly regulated products in commercial use, with over 120 different baseline studies required for new EPA registrations. These studies assess safety to humans, wildlife, and the environment. On average it takes around 11 years for a new product to be registered, sold and used in the U.S. marketplace.
- Neonics are required to undergo periodic evaluation to ensure they continue to meet the highest standards of safety necessary to protect human health and the environment.
- The FIFRA-mandated review process was diligently followed during registration review.
- Neonicotinoid registration review was initiated in 2008 and 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.

- NRDC's petition calls into question EPA's proven and thorough review which includes public and stakeholder input at multiple points throughout the process. The petition disregards the established FIFRA process that guides all pesticide registrations.

Revocation of food tolerances for the neonicotinoids would have a tremendous negative impact on US agriculture as they are cornerstones of many insect control programs. KARA would point EPA to the detailed technical arguments made by the product manufacturers on the safety of the established tolerances.

KARA seeks a timely completion of this petition process. Any additional delay of the neonicotinoid registration review process is unmerited, and would prevent EPA from completing registration decisions on other chemicals that are critical for US agriculture.

Thank you for the opportunity to submit these comments.

Respectfully,

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