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Submitted via Federal eRulemaking Portal

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U.S. Environmental Protection Agency
Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: **Docket ID: EPA-HQ-OPP-2017-0011; FRL-9958-19 (*Registration Review; Neonicotinoid Risk Assessments*)**

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments on the U.S. Environmental Protection Agency (EPA) Office of Pesticide Programs' (OPP): Aquatic Ecological Assessment for Imidicloprid; Combined Preliminary Pollinator Risk Assessment for Clothianidin and Thiamethoxam; the Draft Bee Assessment for Dinotefuran; and the Registration Review Update for Four Neonicotinoid Insecticides.

I. About NASDA

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities. Conservation and environmental protection are also among our chief responsibilities.

In forty-three states and Puerto Rico, the state department of agriculture is a co-regulator with EPA and responsible for administering, implementing and enforcing the production, labeling, distribution, sale, use and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and in forty-seven states, the lead Apiary Inspector resides within the state department of agriculture.

II. General Comments

Crop protection tools are an important component within many agricultural production systems, and FIFRA establishes a rigorous, scientific evaluation and risk-benefit review process for these tools. NASDA supports the scientifically-sound development, review, registration, and re-registration of crop protection technologies, such as the neonicotinoid class of insecticides.

Since 1994, neonicotinoids have been an effective and proven tool in controlling a wide range of destructive insect pests and invasive species on crops (corn, soybeans, wheat, cotton and sorghum), ornamental plants, lawns and pet protection (flea control). Neonicotinoids are uniquely suited to

control many early-season insects, and due to their selective control of harmful insect pests neonicotinoids help ensure important beneficial insects remain available to keep other potential pests in check. Neonicotinoids are also a highly valued tool in Integrated Pest Management (IPM) programs.

NASDA supports science-based Integrated Crop Management (ICM) and Integrated Pest Management (IPM) as an ecosystem-based management strategy to achieve economical control of pest or disease by coordinating management activities with recommended crop production practices and minimizing hazards to crops, human health, and the natural environment to achieve economical, long-lasting solutions to pest and disease problems while minimizing environmental impacts. For many crop systems, neonicotinoids have demonstrated high IPM compatibility in controlling a variety of different pests including, but not limited to: Asian Citrus Psyllid; Wireworm; Seedcorn Maggot; Corn Rootworm; Soybean Aphid; Thrips; Bean Leaf Beetle; Emerald Ash Borer; Leafhoppers; Mealybugs; Sharpshooters; Black Peach Aphid; and other devastating pest stressors. Neonicotinoids are a critical tool for growers and pest control advisors in addressing the constant challenges from resistance issues, pest resurgence, and secondary pest outbreaks.

As EPA undertakes its science-based, risk-benefit review under FIFRA, NASDA encourages the Agency to incorporate the critical uses and benefits of the neonicotinoid class of insecticides to ensure growers have access to a broad range of technologies and modern crop protection tools necessary to combat the constant pest stressors and weed-resistance challenges and to enable growers to produce our nation's food, fiber, and fuel.

III. Addressing Pollinator Health

NASDA strongly supports protecting and promoting honeybee health, and NASDA notes the most effective approach to addressing the complex set of factors impacting bee health is through science-based Best Management Practices (BMPs) and through active participation in State Managed Pollinator Protection Plans (MP3s).

There are numerous and complex factors associated with bee health, including: parasites and diseases, lack of genetic diversity, need for improved forage and nutrition, need for increased collaboration and information sharing, and a need for additional research on the potential impacts certain pesticides may have on honey bee health.

The multitude of these stressors do not lend themselves to a single, uniform solution that will successfully address all of these variables across the diverse and robust agricultural community in all fifty states and four territories. However, the MP3 model utilizing the state departments of agriculture as the vehicle to unify, discuss, and develop best management plans has resulted in improved pollinator health and a more productive and synergetic relationship between beekeepers, growers, applicators, and other agricultural stakeholders. MP3s are built on robust communication efforts, BMPs, and IPM programs specifically crafted to serve and support local agricultural practices and to ensure informed

and workable solutions are developed and implemented through public-private partnerships at the state level to achieve sound policy initiatives.

In March 2016, NASDA co-hosted an MP3 Symposium with EPA, the U.S. Department of Agriculture (USDA), and the Honey Bee Health Coalition to identify, share, and provide tools, insights, and relationships necessary for states, tribes, and other stakeholders to pursue the effective and efficient development and implementation of MP3s across the country.

NASDA appreciates the significant efforts our federal partners and stakeholders have invested, to date, in supporting MP3s as a successful, non-regulatory vehicle to achieve risk mitigation and enhance collaboration across the agricultural stakeholder community. At the same time, NASDA notes the most significant challenge in developing, implementing, and sustaining these MP3s is the lack of resources currently available to assist states in this process. NASDA calls on our federal partners to provide states and tribes the resources necessary to complete and sustain this critical work.

IV. Conclusion

Growers face constant pressures ranging from pest stressors, resistance issues, and countless other challenges which are often times only manageable and mitigated through critical crop protection tools, such as neonicotinoids. EPA registered neonicotinoids as reduced-risk alternatives to organophosphates and other older classes of chemistry, and it is essential EPA incorporate these benefits in the Agency's neonicotinoid review process. NASDA stands ready to assist our federal partners to better inform the general public of the Agency's comprehensive, scientifically-based risk assessment process under FIFRA.

NASDA notes the complexity in evaluating and addressing the many factors impacting honey bees, and NASDA strongly supports the continued development and implementation of MP3s as a successful, non-regulatory vehicle to establish a systematic and comprehensive method for beekeepers, growers, applicators, landowners, and agricultural stakeholders to cooperate and communicate in a timely manner allowing all parties to operate successfully, achieve enhanced pollinator health, mitigate potential pesticide exposure to bees, and allow for the effective management of various pest stressors. NASDA calls on our federal partners to provide states and tribes the resources necessary to complete and sustain this critical work.

Thank you for your consideration, and we appreciate this opportunity for comment. Please contact Dudley Hoskins (dudley@nasda.org) if you have any questions or would like any additional information.

Sincerely,

Nathan Bowen
Director, Public Policy