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March 23, 2018

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

RE: Registration Reviews: Neonicotinoid Risk Assessments; Neonicotinoid Benefits Assessments EPA-HQ-OPP-2011-0865-0250; Docket IDs No. Docket IDs No. EPA-HQ-OPP-2008-0844 (Imidacloprid), EPA-HQ-OPP-2011-0865 (Clothianidin), and EPA-HQ-OPP-2011-0581 (Thiamethoxam)

Dear Sir or Madam:

On behalf of the American Soybean Association (ASA), I am writing to provide comments on the registration reviews of neonicotinoid risk assessments; neonicotinoid benefits assessments, Docket IDs No. EPA-HQ-OPP-2008-0844 (Imidacloprid), EPA-HQ-OPP-2011-0865 (Clothianidin), and EPA-HQ-OPP-2011-0581 (Thiamethoxam). ASA represents all U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean producing states.

As producers, we want to be able to continue to grow safe and affordable food so that we can feed an estimated 9.7 billion people by 2050. Pesticides are only one of the tools we use to do that, but they are important. With the right products available like neonicotinoids, producers can reduce soil erosion and pesticide use and as a result, grow a more affordable product while reducing impacts to the environment.

Imidacloprid, Thiamethoxam and Clothianidin Use

Neonicotinoids are some of the most effective tools used by soybean producers to manage pests. Whether they are used as foliar sprays, soil applications, or as seed treatments, neonicotinoids are essential in reducing damage to soybeans caused by various pests living below the surface or above-ground and improving plant vigor and crop yield. One of the most common uses is to utilize seed treatments that contain imidacloprid, thiamethoxam or clothianidin to protect vulnerable soybean seedlings from insects in the soil that could destroy the crop before it ever matures. Furthermore, these chemicals can aid in sound conservation techniques.

Many producers have adopted reduced tillage practices, which can help prevent erosion, while others have increased use of cover crops that improve soil health, nutrient sequestration and water

quality. However, these practices can also result in an increase in many soil insects including seedcorn maggots. The seedcorn maggot, part of the fly family, attacks soybean seedlings underground, resulting in poor emergences and significant stand reduction. Seed treatments with imidacloprid, thiamethoxam or clothianidin can help prevent this problem, allowing more producers to engage in reduced tillage practices and planting cover crops on their farms. The products can also help limit damage and prevent future generations of some early-season above-ground pests, such as the soybean aphid or the bean leaf beetle.

Resistance Management

Our producers value the use of these chemicals as part of integrated pest management (IPM) programs. They provide a unique mode of action, allowing producers 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.

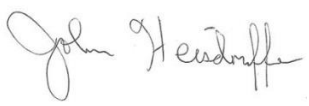
Unintended Consequences

While evaluating the importance of the availability of treatments that contain imidacloprid, thiamethoxam or clothianidin, it's important to also look at any unintended consequences that would result from limiting or eliminating this tool. If this option is taken off the table, producers could be forced to choose more expensive, less effective tools to combat pests. In fact, replacing neonicotinoids is estimated to cost U.S. farmers nearly $850 million per year. 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 like imidacloprid, thiamethoxam or clothianidin. 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.

Our members recognize and appreciate the role of sound rules and regulations in ensuring we can both feed the world and act responsibly to protect our environment. At the same time, that needs to be done in a way that uses sound science and considers how important these chemicals are to the farmer that grow the food, the communities that rely on agribusiness, and ultimately the consumer. We urge the EPA to take these factors into consideration as well as unintended consequences like escalated pesticide resistance, greater use of less effective pesticides, and soil erosion from increased tillage.

On behalf of America's soybean farmers, thank you for the opportunity to comment.

Sincerely yours,



John Heisdorffer
President