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April 14, 2016

Kelly Ballard
Chemical Review Manager
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Pollinator Ecological Risk Assessments: Imidacloprid Registration Review
EPA-HQ-OPP-2008-0844

Dear Ms. Ballard:

The US Canola Association (USCA) writes to submit comments in response to the Environmental Protection Agency's (EPA) request for stakeholder input (Federal Register Notice, EPA-HQ-OPP-2008-0844) regarding the Agency's registration review of imidacloprid, pertaining specifically to the compound's risk to honey bees and other pollinators.

The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. Since USCA's establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to over 1.7 million acres in 2015. Virtually all of this acreage is planted with hybrid seed, making canola's seed-stock production one of the many crops that require and rely on the pollination services provided by honey bees, and the USCA is committed to ensuring the health of pollinators and honey bees.

The USCA is a founding member of the Honey Bee Health Coalition (HBHC) and supports its mission to "collaboratively implement solutions that will help to achieve a healthy population of honey bees while also supporting healthy populations of native and managed pollinators in the context of productive agricultural systems and thriving ecosystems." One of the four key focal points of the HBHC is helping to promote the further implementation of best management practices (BMPs) when the use of insecticides are necessary to control pests.

The use of seed treatments, including imidacloprid, to control pests such as aphids, flea beetles, and wireworms, would be described as a BMP when compared to less effective alternative foliar applications for control of these pests; and is much more environmentally friendly and less harmful to honey bees and pollinators. The review noted that several canola semi-field and full-field studies with imidacloprid found that all samples of pollen or nectar were "reported to be either below LOD or LOQ, depending on the study." Clearly, if residues (if any) of imidacloprid

are below the smallest concentration that can be reliably measured, it would indicate that there is little to no risk of harm to honeybees or pollinators when the product is used as prescribed by the label.

Canola is a high-management crop to grow, with the first challenge being obtaining an adequate stand during emergence. The canola plant's major pest – flea beetles – is quite predominant in regions where canola is grown, and small emerging canola seedlings in the cotyledon stage are very susceptible to flea beetle infestations which can cause substantial damage to or destroy cotyledons in a short period of time.



Flea beetles feeding on, damaging canola cotyledons

The ability to use imidacloprid and other neonicotinoid systemic seed treatments to control flea beetle infestations is essential to canola producers. Alternative control measures call for the application of foliar insecticides, and as mentioned previously, are less effective and can be harmful to beneficial insects, most notably carabid beetles and parasitic wasps.

Finally, canola is an ideal food source for honey bees and other pollinators – the canola plant during its up to four week blooming period produces plentiful pollen that offers a good balance of amino acid and protein that is essential for good bee and pollinator health. The loss of imidacloprid and other neonicotinoid seed treatments would cause a decrease in canola production and acreage, either through lost acreage due to flea beetle damage or simply growers moving to alternative crops that are not susceptible to flea beetles. This loss of canola acreage could ultimately be harmful to the overall health of honey bees and other pollinators as it would detract from the goal of increasing high quality forage and nutritional habitat suitable for honey bees.

The USCA is encouraged that the EPA is looking at science-based decision-making in evaluating imidacloprid and other neonicotinoids, and urges the Agency to use the overwhelming data that supports the continued registration of imidacloprid and other neonicotinoid seed treatments. As noted above, the USCA believes the loss of these products could actually have a detrimental effect on the overall goal of increasing honey bee and pollinator health due to the loss of canola acreage and the nutritional forage opportunities provided to honey bees and pollinators by canola.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Jeff Scott', written over a light blue horizontal line.

Jeff Scott
President, U.S. Canola Association