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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Imidacloprid Registration Review – Docket ID: EPA-HQ-OPP-2008-0844; Clothianidin Registration Review – Docket ID: EPA-HQ-OPP-2011-0865; Thiamethoxam Registration Review – Docket ID: EPA-HQ-OPP-2011-0581

The US Canola Association (USCA) writes to submit comments on regarding the registration reviews of imidacloprid, clothianidin, and thiamethoxam. 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 2 million acres in 2017.

USCA appreciates the opportunity to offer comments supporting the continued registration of neonicotinoid seed treatments, including imidacloprid, clothianidin, and thiamethoxam. Neonicotinoids are some of the most effective insecticides used by canola producers to manage early season damage caused by flea beetles and wireworms.

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 predominate 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 neonicotinoid systemic seed treatments, including imidacloprid, clothianidin, and thiamethoxam, to control flea beetle infestations is essential to canola producers. Alternative control measures call for the application of foliar insecticides that are less effective and can be harmful to beneficial insects, most notably carabid beetles and parasitic wasps. The

neonicotinoid class of insecticides are also less toxic to birds and mammals, when compared to organophosphate and carbamate insecticides.

Finally, canola is an ideal food source for honey bees and other pollinators – the canola plant during its up to four week or longer 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 neonicotinoid seed treatments, including imidacloprid, clothianidin, and thiamethoxam, 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 neonicotinoids, and urges the Agency to use the overwhelming data that supports the continued registration of neonicotinoid seed treatments, including imidacloprid, clothianidin, and thiamethoxam.

Respectfully yours,

Rob Rynning
President, U.S. Canola Association