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Environmental Protection Agency
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RE: Petition to Revoke all neonicotinoid tolerances; Docket ID EPA-HQ-OPP-2020-0306

The US Canola Association (USCA) writes to submit comments regarding the Natural Resources Defense Council petition to revoke all tolerances for neonicotinoid pesticides (acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam) on raw agricultural commodities. 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 2019.

The USCA previously submitted comments on the respective registration review cases for imidacloprid, clothianidin, and thiamethoxam. It is important that the registration review process is completed in a timely manner and in compliance with the FIFRA statute. EPA has completed human health risk assessments and had two open comment periods to allow the public feedback to the Agency.

- Neonicotinoid registration review was initiated in 2008 and to date 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.

As indicated in our previous comments, 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.

Canola is also an ideal food source for honey bees and other pollinators – the canola plant has a blooming period that lasts four weeks or longer and produces plentiful pollen that offers a good balance of amino acid and protein that is essential for good bee and pollinator health. To that end, the USCA, in cooperation with the Honey Bee Health Coalition, developed [Best Management Practices for Pollinator Protection in Canola Fields](#) to promote and ensure the health of honey bees and other pollinators.

The loss of 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 urges EPA to continue using 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.

Respectfully yours,

A handwritten signature in black ink that reads "Pat Murphy".

Pat Murphy
President
U.S. Canola Association