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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
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RE: Docket ID EPA-HQ-OPP-2021-0575, National Level Threatened and Endangered Species Biological Evaluations for Clothianidin, Imidacloprid and Thiamethoxam

The US Canola Association (USCA) writes to submit comments regarding the biological evaluations 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 2021.

USCA appreciates the opportunity to offer comments, as we have throughout the FIFRA process, regarding neonicotinoid seed treatments, including imidacloprid, clothianidin, and thiamethoxam. USCA submitted comments on the registration reviews for these products in 2016 (Federal Register Notice, EPA-HQ-OPP-2008-0844); as well as in 2018 and 2020 (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). Neonicotinoids are some of the most effective insecticides used by canola producers as a seed treatment to manage and control early season damage caused by flea beetles and wireworms.

Canola production in the U.S. is primarily in the northern tier, with the majority grown in North Dakota, a steadily increasing presence in the Pacific Northwest region and opportunities for growth in the Great Plains and southeastern regions as well. 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 – during its four week or longer blooming period the canola plant 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, 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.

Canola is also a feedstock utilized for the production of biodiesel and renewable diesel which are experiencing increased demand due to incentives, including the federal Renewable Fuel Standard and state low-carbon fuel standards implemented to reduce greenhouse gas emissions from fossil fuels. Additional supplies of renewable fuel feedstocks will be needed to meet future emissions reductions goals.

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 availability of neonicotinoid seed treatments, including imidacloprid, clothianidin, and thiamethoxam.

Respectfully yours,



Andrew Moore
President
U.S. Canola Association