



CALIFORNIA FARM BUREAU FEDERATION

EXECUTIVE OFFICES

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 • PHONE (916) 561-5520 • FAX (916) 561-5690

July 24, 2017

Ricardo Jones
Pesticide Re-Evaluation Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Registration Review; Docket ID: EPA-HQ-OPP-2011-0865

Dear Mr. Jones:

Thank you for the opportunity for the California Farm Bureau Federation (CFBF) to submit comments on the registration review draft risk assessments of several neonicotinoid insecticides, including clothianidin. As California's largest agricultural organization, CFBF represents over 48,000 farmers, ranchers, and associated members throughout the state who are engaged in the world's most abundant and diverse production of food, feed, and fiber. Our membership also includes beekeepers, some of whom provide pollination services in interstate commerce and others who engage in honey production.

Without question, neonicotinoid insecticides provide the agricultural sector significant benefits in managing crops and provide us the ability to produce our food in a safe, efficient, and affordable manner. Clothianidin is a widely used insecticide that has many beneficial uses. It is a critical tool for integrated pest management (IPM) plans and is generally used to control or eradicate common pests, including leafhoppers, mealy bugs, and sharpshooters. Clothianidin is often used to deal with infestations of insects in orchards, as well as to control insects that transmit diseases within grapevines and citrus. For the control of certain pests (i.e., white grubs), it is an effective treatment for strawberries and many other commodities. It suppresses infestation by aphids that can attack Christmas tree farms and is also recommended for protecting against the Emerald Ash Borer (EAB).¹ For many agricultural producers and agricultural crops – including grapes, citrus, strawberry growers, timber producers and others – clothianidin is an essential tool in which the benefits are widely documented.

With members involved in the apiculture industry, CFBF recognizes that the challenges facing commercial beekeepers and honey producers are concerning. EPA's review of clothianidin comes at a time of increased scrutiny over a class of pesticides (neonicotinoids) whose impacts on bee health are being re-evaluated. CFBF supports efforts to assist this sector of agriculture in meeting those challenges as many of the state's crops depend on pollinators to help produce

¹ Herms, Daniel et al. "Insecticide Options for Protecting Ash Trees from Emerald Ash Borer." 2014.
http://www.emeraldashborer.info/documents/Multistate_EAB_Insecticide_Fact_Sheet.pdf

agricultural products. California's Pollinator Protection Plan serves to reduce exposure of pesticides to pollinators while protecting agricultural crops from harmful pests by fostering communication, cooperation and collaboration between beekeepers and growers. In addition to these efforts, we support increased research into the causes of honey bee decline and to help determine the most appropriate and effective method in assuring hive health. Many factors – including genetics, the varroa mite, and others – have been cited as potential causes, and the National Academy of Sciences has pointed out that there are numerous factors that need to be addressed in helping to restore colony health. In general, CFBF supports efforts to identify the real challenges facing the honey bee industry and we will continue to work with EPA in finding solutions to these challenges.

A loss of neonicotinoids would have a serious impact on soil, water and pest management practices, including the loss of land used for wildlife conservation. Neonicotinoids add about \$4 billion of value and jobs to the United States economy; their loss would negatively impact farmers, families, communities and the economy.² Additionally, farmers would have to use other pesticides in greater quantities if neonicotinoids like clothianidin are no longer available.

In its review of clothianidin, EPA should adhere to its statutory charge, which requires the agency to weigh the costs and benefits of insecticides when making registration determinations. CFBF believes it is clear that clothianidin provides real, tangible benefits to multiple agricultural stakeholders and that it does not pose an unreasonable risk to health or the environment. Clothianidin is a critical tool to many agricultural growers to ensure they can produce their crops economically and efficiently. CFBF's members will be directly affected by the agency's decision on the registration of clothianidin and we urge EPA to continue to allow the use of clothianidin.

Thank you again for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Wenger", with a stylized flourish at the end.

Paul Wenger, President
California Farm Bureau Federation

² "Executive Summary: The Value of Neonicotinoids in North American Agriculture." n.d.
https://growingmattersorg.files.wordpress.com/2017/04/fact-sheet-executive-summary_the-value-of-neonicotinoids-in-north-american-agriculture2.pdf



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July 24, 2017

Steven Snyderman
Pesticide Re-Evaluation Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Registration Review; Docket ID: EPA-HQ-OPP-2011-0920

Dear Mr. Snyderman:

Thank you for the opportunity for the California Farm Bureau Federation (CFBF) to submit comments on the registration review draft risk assessments of several neonicotinoid insecticides, including dinotefuran. As California's largest agricultural organization, CFBF represents over 48,000 farmers, ranchers, and associated members throughout the state who are engaged in the world's most abundant and diverse production of food, feed, and fiber. Our membership also includes beekeepers, some of whom provide pollination services in interstate commerce and others who engage in honey production.

Without question, neonicotinoid insecticides provide the agricultural sector significant benefits in managing crops and provide us the ability to produce our food in a safe, efficient, and affordable manner. Dinotefuran is a widely used insecticide that has many beneficial uses. It is a critical tool for integrated pest management (IPM) plans and is generally used to control or eradicate common pests, including leafhoppers, mealy bugs, and sharpshooters. Dinotefuran is often used to deal with infestations of insects in orchards, as well as to control insects that transmit diseases within grapevines and citrus. For the control of certain pests (i.e., white grubs), it is an effective treatment for strawberries and many other commodities. It suppresses infestation by aphids that can attack Christmas tree farms and is also recommended for protecting against the Emerald Ash Borer (EAB).¹ For many agricultural producers and agricultural crops – including grapes, citrus, strawberry growers, timber producers and others – dinotefuran is an essential tool in which the benefits are widely documented.

With members involved in the apiculture industry, CFBF recognizes that the challenges facing commercial beekeepers and honey producers are concerning. EPA's review of dinotefuran comes at a time of increased scrutiny over a class of pesticides (neonicotinoids) whose impacts on bee health are being re-evaluated. CFBF supports efforts to assist this sector of agriculture in meeting those challenges as many of the state's crops depend on pollinators to help produce agricultural

¹ Herms, Daniel et al. "Insecticide Options for Protecting Ash Trees from Emerald Ash Borer." 2014.
http://www.emeraldashborer.info/documents/Multistate_EAB_Insecticide_Fact_Sheet.pdf

products. California's Pollinator Protection Plan serves to reduce exposure of pesticides to pollinators while protecting agricultural crops from harmful pests by fostering communication, cooperation and collaboration between beekeepers and growers. In addition to these efforts, we support increased research into the causes of honey bee decline and to help determine the most appropriate and effective method in assuring hive health. Many factors – including genetics, the varroa mite, and others – have been cited as potential causes, and the National Academy of Sciences has pointed out that there are numerous factors that need to be addressed in helping to restore colony health. In general, CFBF supports efforts to identify the real challenges facing the honey bee industry and we will continue to work with EPA in finding solutions to these challenges.

A loss of neonicotinoids would have a serious impact on soil, water and pest management practices, including the loss of land used for wildlife conservation. Neonicotinoids add about \$4 billion of value and jobs to the United States economy; their loss would negatively impact farmers, families, communities and the economy.² Additionally, farmers would have to use other pesticides in greater quantities if neonicotinoids like dinotefuran are no longer available.

In its review of dinotefuran, EPA should adhere to its statutory charge, which requires the agency to weigh the costs and benefits of insecticides when making registration determinations. CFBF believes it is clear that dinotefuran provides real, tangible benefits to multiple agricultural stakeholders and that it does not pose an unreasonable risk to health or the environment. Dinotefuran is a critical tool to many agricultural growers to ensure they can produce their crops economically and efficiently. CFBF's members will be directly affected by the agency's decision on the registration of dinotefuran and we urge EPA to continue to allow the use of dinotefuran.

Thank you again for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Wenger", with a stylized flourish at the end.

Paul Wenger, President
California Farm Bureau Federation

² "Executive Summary: The Value of Neonicotinoids in North American Agriculture." n.d.
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July 24, 2017

Ricardo Jones
Pesticide Re-Evaluation Division, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Registration Review; Docket ID: EPA-HQ-OPP-2008-0844

Dear Mr. Jones:

The California Farm Bureau Federation (CFBF) would like to submit comments on the above referenced docket, by which the U.S. Environmental Protection Agency seeks public comment on the registration review draft risk assessments of several neonicotinoid insecticides, including imidacloprid. As California's largest agricultural organization, CFBF represents over 48,000 farmers, ranchers and associated members throughout the state who are engaged in the world's most abundant and diverse production of food, feed, and fiber. We appreciate the opportunity to share our views on this important issue.

Without question, neonicotinoid insecticides provide the agricultural sector significant benefits in managing crops and provide the ability to produce food in a safe, efficient, and affordable manner. Imidacloprid is a widely used insecticide within agriculture that has many beneficial uses. It is a critical tool for integrated pest management (IPM) plans and is generally used to control or eradicate common pests, including leafhoppers, mealy bugs, and sharpshooters. Imidacloprid is often used to deal with infestations of insects in orchards, as well as to control insects that transmit diseases within grapevines and citrus. Critical to the California citrus industry, neonicotinoids are very important for protecting young trees from the Asian citrus psyllid, an invasive insect that has devastated citrus industries in Florida and other states.

For the control of other pests such as white grubs it is an effective treatment for strawberries and many other commodities; it also suppresses infestation by aphids that can attack Christmas tree farms and imidacloprid is recommended for protecting against the Emerald Ash Borer (EAB).¹ For many agricultural producers and agricultural crops – including grapes, citrus, strawberry growers, timber producers and others – imidacloprid is an essential tool in which the benefits are widely documented.

¹ Herms, Daniel et al. "Insecticide Options for Protecting Ash Trees from Emerald Ash Borer." 2014.
http://www.emeraldashborer.info/documents/Multistate_EAB_Insecticide_Fact_Sheet.pdf

A loss of neonicotinoids like imidacloprid would have a serious impact on soil, water and pest management practices, including the loss of land used for wildlife conservation. A report recently conducted by AgInfomatics showed that U.S. cropped land would increase between 340,000 and 410,000 acres to offset losses in yield and quality, much of which would come from the Conservation Reserve Program, environmentally sensitive land established to preserve water, soil, and wildlife.² Neonicotinoids add billions of dollars of value and jobs in North America; their loss would negatively impact farmers, families, communities and the economy. Additionally, farmers would have to use other pesticides in greater quantities if neonicotinoids like imidacloprid are no longer available.

In its review of imidacloprid, EPA should adhere to its statutory charge, which requires the agency to weigh the costs and benefits of insecticides when making registration determinations. Thus far, there has been little evidence to show that the costs of imidacloprid outweigh the benefits. Real world evidence over the past 25 years has shown that no indications of species loss or a permanent reduction in populations has been documented. An ecological risk assessment conducted in 2016 further supported this evidence by concluding that “the aquatic invertebrate community is unlikely to be adversely affected by acute or chronic exposure to imidacloprid resulting from currently registered uses of imidacloprid in the United States.”³

CFBF believes it is clear that imidacloprid provides real, tangible benefits to multiple agricultural stakeholders and that it does not pose an unreasonable risk to human health or the environment. Imidacloprid is a critical tool to many agricultural growers to ensure they can produce their crops economically and efficiently. CFBF’s members will be directly affected by the agency’s decision on the registration of imidacloprid and we urge EPA to continue to allow its use.

Thank you again for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Wenger", with a stylized flourish at the end.

Paul Wenger, President
California Farm Bureau Federation

² “Executive Summary: The Value of Neonicotinoids in North American Agriculture.” n.d.
https://growingmattersorg.files.wordpress.com/2017/04/fact-sheet-executive-summary_the-value-of-neonicotinoids-in-north-american-agriculture2.pdf

³ Whitfield-Aslund, Melissa et al. “Ecological risk assessment for aquatic invertebrate communities exposed to imidacloprid as a result of labeled agricultural and nonagricultural uses in the United States.” 2016.
<https://www.ncbi.nlm.nih.gov/pubmed/27753126>



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July 24, 2017

Thomas Harty
Pesticide Re-Evaluation Division , Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Re: Registration Review; Docket ID: EPA-HQ-OPP-2011-0581

Dear Mr. Harty:

Thank you for the opportunity for the California Farm Bureau Federation (CFBF) to submit comments on the registration review draft risk assessments of several neonicotinoid insecticides, including thiamethoxam. As California's largest agricultural organization, CFBF represents over 48,000 farmers, ranchers, and associated members throughout the state who are engaged in the world's most abundant and diverse production of food, feed, and fiber. Our membership also includes beekeepers, some of whom provide pollination services in interstate commerce and others who engage in honey production.

Without question, neonicotinoid insecticides provide the agricultural sector significant benefits in managing crops and provide us the ability to produce our food in a safe, efficient, and affordable manner. Thiamethoxam is a widely used insecticide that has many beneficial uses. It is a critical tool for integrated pest management (IPM) plans and is generally used to control or eradicate common pests, including leafhoppers, mealy bugs, and sharpshooters. Thiamethoxam is often used to deal with infestations of insects in orchards, as well as to control insects that transmit diseases within grapevines and citrus. For the control of certain pests (i.e., white grubs), it is an effective treatment for strawberries and many other commodities. It suppresses infestation by aphids that can attack Christmas tree farms and is also recommended for protecting against the Emerald Ash Borer (EAB).¹ For many agricultural producers and agricultural crops – including grapes, citrus, strawberry growers, timber producers and others – thiamethoxam is an essential tool in which the benefits are widely documented.

With members involved in the apiculture industry, CFBF recognizes that the challenges facing commercial beekeepers and honey producers are concerning. EPA's review of thiamethoxam comes at a time of increased scrutiny over a class of pesticides (neonicotinoids) whose impacts on bee health are being re-evaluated. CFBF supports efforts to assist this sector of agriculture in meeting those challenges as many of the state's crops depend on pollinators to help produce

¹ Herms, Daniel et al. "Insecticide Options for Protecting Ash Trees from Emerald Ash Borer." 2014.
http://www.emeraldashborer.info/documents/Multistate_EAB_Insecticide_Fact_Sheet.pdf

agricultural products. California's Pollinator Protection Plan serves to reduce exposure of pesticides to pollinators while protecting agricultural crops from harmful pests by fostering communication, cooperation and collaboration between beekeepers and growers. In addition to these efforts, we support increased research into the causes of honey bee decline and to help determine the most appropriate and effective method in assuring hive health. Many factors – including genetics, the varroa mite, and others – have been cited as potential causes, and the National Academy of Sciences has pointed out that there are numerous factors that need to be addressed in helping to restore colony health. In general, CFBF supports efforts to identify the real challenges facing the honey bee industry and we will continue to work with EPA in finding solutions to these challenges.

A loss of neonicotinoids would have a serious impact on soil, water and pest management practices, including the loss of land used for wildlife conservation. Neonicotinoids add about \$4 billion of value and jobs to the United States economy; their loss would negatively impact farmers, families, communities and the economy.² Additionally, farmers would have to use other pesticides in greater quantities if neonicotinoids like thiamethoxam are no longer available.

In its review of thiamethoxam, EPA should adhere to its statutory charge, which requires the agency to weigh the costs and benefits of insecticides when making registration determinations. CFBF believes it is clear that thiamethoxam provides real, tangible benefits to multiple agricultural stakeholders and that it does not pose an unreasonable risk to health or the environment. Thiamethoxam is a critical tool to many agricultural growers to ensure they can produce their crops economically and efficiently. CFBF's members will be directly affected by the agency's decision on the registration of thiamethoxam and we urge EPA to continue to allow the use of thiamethoxam.

Thank you again for your consideration of these comments.

Sincerely,



Paul Wenger, President
California Farm Bureau Federation

² “Executive Summary: The Value of Neonicotinoids in North American Agriculture.” n.d.
https://growingmattersorg.files.wordpress.com/2017/04/fact-sheet-executive-summary_the-value-of-neonicotinoids-in-north-american-agriculture2.pdf