

CTA for Soybean

Tell EPA You Support Soybean Growers' Right to Use Effective Tools

The U.S. Environmental Protection Agency (EPA) has announced a 60-day comment period on the "Benefits of Neonicotinoid Seed Treatments to Soybean Production," closing December 22. Protect growers' rights to have choices in production practices for soy and other crops [by posting your comments today](#).

Urge the EPA to review new information on the [benefits](#) of seed treatments used in soybeans. The current EPA report used a limited data set, was incomplete, and undervalues the benefits that modern seed treatments provide to soybean growers and the economy overall.

1. The EPA based its preliminary conclusions on 26 efficacy studies from university publications, nine articles and 21 responses to an unpublished questionnaire. These data are useful, but not fully representative of the diversity of soybean production or pest dynamics found across the United States. The consulting firm AgInfomatics' forthcoming meta-analysis of soybean yield data uses approximately 25 studies published in the *Arthropod Management Tests* database by the Entomological Society of America and more than 190 site-years of data from trials conducted by university faculty and academic staff and third-party private researchers. Current preliminary results of the AgInfomatics analysis find a yield advantage on average in the range of approximately 3.0% for soybeans, using neonicotinoid seed treatments relative to untreated seed.
2. The consulting firm AgInfomatics completed and analyzed a survey of 500 U.S. soybean farmers, asking them a variety of questions, including the value they derive from neonicotinoid seed treatments. This analysis shows that neonicotinoid-treated seeds have an average value of \$11.93 per acre for soybean growers relative to their next best alternative. When totaled over all soybean acres using neonicotinoids, this value totals more than \$400 million in 2013. This value estimate captures not only the yield benefit of neonicotinoid-seed treatments to farmers, but also the value of non-monetary benefits, including the effectiveness of insect control, improved risk management, protecting the yield, time-saving, resistance, and enhanced human safety.
3. Foliar alternatives exist to help U.S. farmers manage several soybean pests, but foliar insecticides will not provide protection from soil dwelling pests, such as seed maggots, wireworms and white grubs. GfK Kynetec data, based on annual surveys of approximately 4,300 U.S. soybean growers, shows that about one-third of neonicotinoid seed treatments are targeted at these soil-dwelling pests (14 percent at seed maggots, 13 percent at wireworm and 6 percent at white grubs). **No soil insecticides are registered for use in U.S. soybeans**, so farmers have no insecticide alternatives available except neonicotinoid seed treatments to manage these and similar soil-dwelling pests.

4. As the EPA report noted, the cost of alternative foliar insecticides is comparable to neonicotinoid seed treatments. However, once the additional cost of scouting and foliar applications are included, the cost increase for farmers currently using neonicotinoid seed treatments could be as much as \$3.30 per acre. This increase occurs, even when assuming about one-third of the acres currently treated with neonicotinoid seed treatments would remain untreated as part of switching from a protective IPM program using seed treatments to a scouting-based IPM program using foliar applications, according to the consulting firm AgInfomatics.

5. Growers find benefits in a number of different ways that need to be incorporated in estimates of value of any plant protection product. Neonicotinoid seed treatments provide convenience, safety improvements for workers, less disruption to beneficial insects (and less chance of secondary pest resurgence), and pesticide resistance management through less reliance on older broad-spectrum alternatives. These and other values need to be integrated into the EPA assessment.

Go to www.AgVoice4Choice.com to ACT. Advocate for grower choice in pest management; Communicate to Congress about the benefits of pest management; and Tell the EPA to review new information on the benefits of seed treatments. Commenting is fast and easy.