

Stakeholder Letter

The EPA Needs to Hear From You on Neonicotinoids!

The EPA has established a process for assessing the benefits and risks of pesticides known as registration review. Currently, the agency is reviewing a class of insecticides known as the neonicotinoids with a focus on their impact to pollinators. Neonicotinoids are critical for controlling damaging and invasive pests in various agricultural crops, as well as urban and residential landscapes. The loss of neonicotinoids would mean reliance on less effective pest management options, higher operating costs, more frequent spraying of older less-selective products, and increased risks to workers, pollinators and the environment. In fact, new studies show that a loss of neonicotinoids would not only have a devastating impact on some grower operations, but could seriously impact the economic vitality of rural communities dependent on agriculture.

Recently, the EPA announced a 60-day comment period following publication of a benefits assessment report named [Benefits of Neonicotinoid Seed Treatment to Soybean Production](#). Although these reports are common within the EPA, we have concerns in how this report was generated and released to the public. First, the publication of a benefits assessment report to the Federal Register targeting a single use rather than all relevant and registered uses without prior notification is uncommon and outside of the normal process established for such action. Second, the agricultural crop protection companies that manufacture and sell neonicotinoids reviewed all studies referenced in the report, plus additional journal articles and data points and determined that the report was based on a limited and incomplete data set. As a result, the conclusions reached in the report understate the value of seed treatments to soybean pest management and yield enhancement, safety to pollinators, and local agricultural economies.

We have started to release 13 new reports conducted by AgInfomatics, LLC that provide a comprehensive evaluation of the economic and societal benefits of neonicotinoid insecticides in North America. These reports provide reliable, objective evidence of the benefits these products, which are the largest selling insecticide class in the world, for modern pest management systems. Research on commodity crops such as corn, soybeans, wheat, cotton, sorghum and canola, specialty crops such as citrus, vegetables and grapes, plus turf, ornamental and landscape uses show that neonicotinoids add billions of dollars to the economy, and benefit entire communities, not just individual growers. Go to www.GrowingMatters.org for more of the latest information, reports, videos and infographics on the benefits of neonicotinoid insecticides.

We ask that you help Protect Growers' Rights to have choices in production practices for soy, and other crops and uses by posting your comments today. **Your voice definitely matters. Urge EPA to comprehensively review and consider the benefits of seed treatments in soybeans and other crops.** Commenting is fast and easy. Visit www.AgVoice4Choice.com to ACT. There you will find a general sample letter, a soybean specific letter, and additional facts to cite and use to customize, personalize and submit your comments directly to the Federal docket.

If you prefer to comment directly on your organization's letterhead, go to:

- Docket number: EPA-HQOPP-2014-0737 at <http://www.regulations.gov>.
- Address correspondence to Jim Jones, Assistant Administrator for EPA's Office of Chemical Safety and Pollution Prevention.

The comment period closes Dec. 22, so the time to **ACT** is now.

Growing Matters is a coalition of organizations and individuals committed to scientific discourse on the stewardship, benefits and alternatives of neonicotinoid insecticides in North America. [Bayer CropScience](#), [Syngenta](#) and [Valent U.S.A. Corporation](#) are leading this coalition with support from Mitsui Chemicals Agro, Inc. Please direct questions to us. We appreciate your help and efforts to this call to action.

Sincerely,

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