April 25, 2019

Kevin Norton
Acting Associate Chief
Natural Resources Conversation Service
United States Department of Agriculture
Washington, DC


Dear Mr. Norton:

CropLife America (CLA) is the national trade association that represents the manufacturers, formulators and distributors of agricultural pesticides. CLA’s member companies produce, sell and distribute virtually all the vital and necessary crop protection and biotechnology products used by farmers, ranchers and landowners. CLA encourages all types of farming and farming practices and supports environmental policies that are based on sound science and best practices.

In the context of the “Review of USDA Natural Resources Conservation Service National Conservation Practice Standards,” CLA wishes to comment on CEA E595116Z21, Reducing routine neonicotinoid seed treatments on corn and soybean crops.

The justification (“reduce risk of pesticides in surface water”) for this activity is based on false premises, and payment to farmers for implementing not a good use of tax dollars. Use of seed treatment for protecting the crop from insect pests and plant diseases dramatically reduces the amount of insecticide that would otherwise be required for broadcast application to the soil surface, or to the growing plant, or even in-furrow application. The small amount of pesticide required for seed treatment is buried with the seed. Protection from contamination of surface water is virtually complete by this method of pesticide use. In contrast, foregoing seed treatment would encourage and require the in-furrow, soil surface, or foliar applications of much higher amounts of pesticide to protect the crop, with much greater possibility of surface water runoff. The effect of this “Conservation Enhancement Activity” will be the exact opposite of what it purports to achieve.

Control of soil-borne pests that threaten crops at the time of planting and emergence may not lend itself well to scouting, in order to inform decision-making.

- There are no thresholds or appropriate techniques for quantifying very damaging below-ground crop pests.
- Economic damage may have already occurred by the time the pest population is evident.

• When seed treatment is the most effective and economical treatment for a pest problem that might be discovered by scouting, it cannot be a spur-of-the-moment decision. It must be a preventive control.
• Because of the long lead time for seed production and treatment, the decision to use treated seed may need to be made months in advance.
• Eliminating such a seed treatment option reduces choices for Integrated Pest Management.

CLA appreciates the opportunity to comment on this important matter.

Sincerely,

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Cc: Bill Reck