



A professional society representing the nation's crop production and research consultants

PRESIDENT'S COLUMN



By
Steven A. Hoffman
NAICC
2017 President

This Summer's "To Do" List

In addition to being Independence Day for Americans, the Fourth of July also represents a transition from the hectic planting and early season crop-tending to a mid-season period that is typically a little less hectic. We can usually find time to get away to attend a few field days in July or August. This respite also gives us a chance to take care of loose ends and maybe address some projects around the yard that have been neglected due to a lack of time. May I ask you to add a couple of things to your "to do" list for July?

The first item that needs our attention is the EPA Preliminary Pollinator Risk Assessment for the neonics; clothianidin,

thiamethoxam and dinotefuran, as well as an Aquatic Ecological Assessment for imidacloprid. The chance to comment to the dockets expires on July 24, 2017. It is actually really easy to submit comments on EPA.gov. You don't necessarily need to compose a letter. I usually type my message in the dialog box, then click the submit button. You will get a receipt link sent to your email to prove that your comment was registered. (see page 8 for links)

As an organization, NAICC has done a great job of advocating for continuing the labeled uses of chlorpyrifos and several synthetic pyrethroid insecticides this year. Several of our members have also submitted their own personal comments.

The neonic insecticides are the next focus of EPA scrutiny for re-registration. Your comments carry a lot of weight because you understand the issues surrounding these pesticides. We can assume that EPA will receive comments calling for the cancellation of the neonic insecticide registrations. If they don't hear from us, we might lose valuable and safe products from our toolbox. Our ability to manage insecticide resistance would be greatly impaired if we lose this class of chemistry.

We included a fact sheet about the issue in this newsletter. The fact sheet was provided by Valent, Bayer and Syngenta.

It includes great information about how to submit your comments and some background information.

The other item I would like you to consider is service to the NAICC. The 2018 Committee Chairs will be designated in November. If you are interested in chairing or serving on a committee, please contact President-Elect Nathan Goldschmidt. A brief description of the committees that are open to the members can be viewed elsewhere in this newsletter.

Another way to serve the NAICC is to run for a board position. Serving as a Director or Officer is an excellent way to grow your professional network and improve your leadership skills while giving back to a great organization. Michelle and I have thoroughly enjoyed getting to know the other board members and their spouses during my term on the Board. We now have a special lifelong bond with several great families. As Past President, Dan Moser is tasked with chairing the nominating committee for the 2018 Executive Board. If you would consider running for a position on the Board, please feel free to contact Dan or one of the current Board members.

I hope that you get a chance to take a mental break this summer.

Thank you for what you do. It really does matter.

URGENT: TIME SENSITIVE

Below is a letter NAICC received from our Sustaining Members Bayer, Syngenta and Valent regarding submitting comments to EPA on the "neonics".

Dear Valued Stakeholder:

As you are likely aware, the class of insecticides known as neonicotinoids or "neonics" that include imidacloprid, clothianidin, thiamethoxam and dinotefuran are currently undergoing Registration Review with the EPA. Registration Review is a multiyear process, scheduled for completion for all neonics in 2018/2019. The first public comment period in 2016 was for the imidacloprid preliminary pollinator assessment. Along the review timeline, there will continue to be opportunities for stakeholders to directly affect the review outcome by commenting to official EPA dockets. When these opportunities arise, it is critical that you, as a vested stakeholder, articulate how important these products are

to your membership or individual operation and the consequences should they no longer be available. For certain, anti-pesticide NGOs take these same opportunities to advocate for their removal from your pest control toolbox.

Currently, the EPA is soliciting for comments in regards to a combined Preliminary Pollinator Risk Assessment for clothianidin, thiamethoxam and dinotefuran, as well as an Aquatic Ecological Assessment for imidacloprid. The chance to comment to the dockets expires on July 24, 2017. To avoid redundancy, Bayer, Syngenta and Valent are coordinating our requests for comments to these dockets.

What do we need from you?

We respectfully request you provide the following information to the dockets by July 24: (see page 8 for more information)



Happenings on the Hill

Glenn Luedke, NAICC Legislative Assistant

WATERS OF THE US RULE TO BE RESCINDED

The Environmental Protection Agency, Department of Army, and Army Corps of Engineers are proposing a rule to rescind the Clean Water Rule and re-codify the regulatory text that existed prior to 2015 defining “waters of the United States” or WOTUS. This action would, when finalized, provide certainty in the interim, pending a second rulemaking in which the agencies will engage in a substantive re-evaluation of the definition of “waters of the United States.” The proposed rule would be implemented in accordance with Supreme Court decisions, agency guidance, and longstanding practice.

“We are taking significant action to return power to the states and provide regulatory certainty to our nation’s farmers and businesses,” said Administrator Scott Pruitt. “This is the first step in the two-step process to redefine ‘waters of the U.S.’ and we are committed to moving through this re-evaluation to quickly provide regulatory certainty, in a way that is thoughtful, transparent and collaborative with other agencies and the public.”

This proposed rule follows the February 28, 2017, Presidential Executive Order on “Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the ‘Waters of the United States’ Rule.” The February Order states that it is in the national interest to ensure that the Nation’s navigable waters are kept free from pollution, while at the same time promoting economic growth, minimizing regulatory uncertainty, and showing due regard for the roles of Congress and the States under the Constitution. To meet these objectives, the agencies intend to follow an expeditious, two-step process that will provide certainty across the country.

The proposed rule would recodify the identical regulatory text that was in place prior to the 2015 Clean Water Rule and that is currently in place as a result of the U.S. Court of Appeals for the Sixth Circuit’s stay of the 2015 rule. Therefore, this action, when final, will not change current practice with respect to how the definition applies.

The agencies have also begun deliberations and outreach on the second step rulemaking involving a re-evaluation and revision of the definition of “waters of the United States” in accordance with the Executive Order.

“The Army, together with the Corps of Engineers, is committed to working closely with and supporting the EPA on these rulemakings. As we go through the rulemaking process, we will continue to make the implementation of the Clean Water Act Section 404 regulatory program as transparent as possible for the regulated public,” said Mr. Douglas Lamont, senior official

performing the duties of the Assistant Secretary of the Army for Civil Works. For the pre-publication Federal Register Notice and additional information: <http://www.epa.gov/wotus-rule>

CONGRESS

The U.S. Senate passed legislation that addresses the threat of agro-terrorism. The legislation is designed to ensure the safety of the U.S. food supply. The legislation was sponsored by members of the Senate Ag Committee and encouraged by the Department of Homeland Security. The legislation will be considered by the House of Representatives and then sent to the President for final approval.

The Senate Ag Committee advanced H.R. 1029, the Pesticide Registration Improvement Extension Act of 2017, with strong bi-partisan support. The House passed the legislation with overwhelming bi-partisan support in March. Ag, non-ag, environmental and labor groups support the legislation. The bi-partisan support is considered important to the EPA, farmers/ranchers and farm workers. H.R. 1029 reauthorizes the Pesticide Registration Improvement Act to improve pesticide registration and other pesticide related activities, including extending and modifying existing fee authorities. Specifically, the bill extends the maintenance fee provision until 2023 and increases the total amount of maintenance fees to \$31 million, extends the prohibition on levying registration fees, and includes additional uses for any fees collected to defray costs associated with registration review.

The House sub-committee on nutrition programs will hold hearings the week of July 17. It is expected that discussion on SNAP will generate substantial debate regarding the entire Farm Bill.

USDA

Crop Insurance: Proposed cuts of \$30 billion are still forecast in the crop insurance program. Secretary of Agriculture Perdue, at a recent Ag Summit, stated the plan is to eliminate the Harvest Price Option (crop insurance that provides protection on lost production at the higher of the price projected just before planting time or the price at harvest). Grower groups maintain that cutting the subsidy cap will mean growers will buy less crop insurance or none at all. In addition, a “means test” for crop insurance is being proposed.

Farm Program Payments: Members of the U. S. Senate are seeking a GAO review of how the Farm Service Agency has implemented new payment regulations passed in the 2014 law. The intent is to determine the impact of the new regulations and if the regulations help reduce payments to people who do not actually farm. A GAO audit in 2013 outlined the shortcomings of the “actively engaged” rule and how difficult it was for the government to prove fraud related to program eligibility because of loopholes. The “actively engaged” rules eventually published by the USDA under the 2014 law did limit the number of non-family members who

Continued on page 3.

Happenings on the Hill
Continued from page 2.

could receive farm program payments to three (depending on the size and complexity of the farming operation).

USDA Budget: Supplemental Nutrition Assistance Program (SNAP): Budget cuts are proposed for the program and it is likely less cooperation will exist between urban and rural coalitions. In the past, passage of farm bills needed the cooperation of both groups. Some members of Congress want to increase welfare work requirements of those who are considered “able-bodied” and offer this proposal as a way to cushion some of the proposed budget cuts.

Additional significant budget cuts are being proposed for conservation programs, research, crop insurance and international food aid programs.

TRADE

NAFTA renegotiations are expected to start in August and the top priority is to maintain current market access and keep in place what has already been established with trading partners. Agricultural groups maintain a “cautious” approach must be used when modernizing NAFTA.

LABOR

A recent statement in a press release by the Secretary of Labor directs agencies to aggressively confront visa program fraud and abuse. The release implied there was widespread abuse in the guest worker program that includes H-2A. Reports indicate those types of abuses are rare. Most agricultural groups report they have seen little change in labor enforcement since the new Administration came into office.

EPA

The House passed legislation (H.R. 953) that clarifies language in the Reducing Regulatory Burdens Act of 2017. The language clarifies that lawful use of pesticides in or near navigable waters is not excessively covered under two statutes that include the Clean Water Act and the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The Reducing Regulatory Burdens Act corrects the duplicative requirements associated with the EPA National Pollution Discharge Elimination System (NPDES) pesticide permit by specifying that NPDES permits are not needed for the lawful application of EPA-labeled pesticides.

Pesticide Applicator Rules: The EPA announced a twelve-month extension for implementation of the revised final Certification and Training of Pesticide Applicators rule. EPA stated that in order to achieve environmental and economic prosperity, farmers and ranchers need adequate time to come into compliance with regulations. EPA Administration stated the action is part of returning EPA back to its core mission: protecting the environment by engaging with state, local and tribal partners to create sensible regulations that enhance economic growth.

Urgent: Time Sensitive
Continued from page 1.

- Comments on the critical role of neonics and any impacts their loss would have to pest control, IPM programs, input costs, crop yields and quality, landscapes and nurseries, etc.
- Include real-world use information, including target markets, percentage of acres/area treated, use rates and number of applications, target pests, impacts of alternative products (if available), resistance-management concerns, etc.
- Ask the EPA to consider the real-world use information provided and other relevant data to make higher-tiered, science-based assessments — rather than ultra-conservative assessments based on unrealistic use patterns.
- Once completed, please post your comments to each of the four open dockets (imidacloprid, clothianidin, thiamethoxam and dinotefuran), so that the neonics are represented as a whole.

To assist your efforts, we have attached supporting information, outlining the review timelines, product brands and benefits of neonics, along with instructions for submitting your comments to the dockets. You can also find these and other supporting studies at www.GrowingMatters.org.

If you have any questions regarding a specific neonicotinoid, please feel free to contact one of us, depending on the product in question.

Thank you for your sustained effort in ensuring these products remain available in the marketplace.

Sincerely,

Alan R. Ayers, Ph.D.
Director Stakeholder
Relations/Stewardship
Bayer Crop Science

Paul Backman
Head of Industry
Relations, NA
Syngenta

Jeffrey D. Smith
Industry Affairs
Manager
Valent USA

SAVE THE DATE

NAICC 2018 Annual Meeting & AG PRO EXPO

January 16-20, 2018

Marriott Starr Pass Resort, Tucson, AZ



NAICC Committees

Allied Industry

The purpose of this committee is to develop methods through which Sustaining members can recommend ways that NAICC and industry can work more closely on projects they have in common. This committee also identifies areas of mutual concern and provides an avenue of communication. The working group of this committee evaluates submissions from industry for the Emerging Technologies session at the annual meeting and provides the Board with their recommendations.

The committee appoints a Vice Chair from within its members at each annual meeting. The Vice Chair automatically moves to Chair the following year unless the Allied Industry Working Group votes to select a new Chair.

All Sustaining members are automatically members of the Allied Industry Committee. The Allied Industry Working Group is the body that conducts and votes on committee business.

Annual Meeting Coordination Committee

The purpose of this committee is to coordinate the overall program for the annual meeting, with input from the Consultant Education, Research Education and Quality Assurance Education Subcommittees. The chairs of the three education subcommittees and the chair of the AMC comprise the overall Annual Meeting Committee. Subcommittee chairs for the CEC, REC and QAEC work with their members to set themes for sessions, select topics, and identify potential speakers when each subcommittee meets at the annual meeting.

Certification

The Certification Board administers and modifies the NAICC Certification program as needed. Members may be appointed to the Certification Board by either the President-Elect or the Chair, at the discretion of the President-Elect. All members of this Board must be certified under the NAICC certification program.

Education Outreach

This committee is responsible for planning and promoting the Focus on Precision Ag workshop, the GLP Training course and other regional workshops held annually. They should recommend locations and topics for their respective meetings.

This Committee has two subcommittees: Consultant Education and Researcher/QA Education.

Grievance and Ethics Committee

This committee exists to review, if and when necessary, any grievance filed against a member of NAICC and recommend to the Board whether any action should be taken upon such grievance. This committee is also responsible for reviewing the NAICC Code of Ethics periodically.

Governmental Affairs

GAC-Crop Consultant (GAC-C)

GAC-Researcher & QA (GAC-R)

Crawfish Boil On The Hill (CBOH)

The GAC monitors and discusses legislation and regulatory issues and policies, pending, proposed and needed, specifically those that will directly impact NAICC members, but also general agricultural, environmental and food issues on which NAICC may be consulted or wish to express an opinion. The committee assists the Executive Vice President with the responsibility of providing information to the membership through newsletter articles and mailings and identifies issues and develops talking points for the NAICC Board prior to hill visits.

The CBOH subcommittee plans the annual CBOH event to be held in conjunction with the March Executive Board meeting in Washington, D.C.

International Outreach

This committee works to establish contact with other consulting organizations outside of the U.S. and to look for opportunities to cooperate on educational programs and information exchange. Through contact with international consulting organizations and international members, keeps NAICC informed of issues facing consultants in other countries. This committee also acts as liaison to the Global Alliance of Independent Crop Consultants.

Leadership Program Committee

This committee is responsible for developing and implementing certain portions of the NAICC Leadership Program (NAICCLP).

Marketing

This committee is responsible for marketing the association to sustaining members and current membership. The committee is also responsible for the Consultant of the Year award program.

Membership Recruitment, Retention, and Rules Committee

The committee is responsible for reviewing all applications for membership and accepting or rejecting them, periodic examination of the eligibility of all members and making recommendations concerning re-classification or cancellation of memberships when necessary. The committee also assists in recruitment of new members and acts as a liaison to new members during their first two years of membership.

Newsletter Subcommittee

This committee works with the Executive Vice President to accumulate articles for the NAICC News. Committee members write and solicit articles and interview members.

State Affiliate Relations Committee

1. Work with State consulting organizations to create more involvement from consultants on national level.
2. Help establish state groups not yet organized.
3. Identify state organizations not part of NAICC and recruit them to be a state affiliate.

NAICC Photo Contest



The current theme is: **IRRIGATION**

Upload your photo at: <http://naicc.org/photo-contest-upload-form/>

Photos must be uploaded no later than 11:59 pm on July 31, 2017 to be included in the current contest. Please submit no more than 3 photos per person.

Look through the next newsletter to see the winning photo.

By submitting contest photos, you agree to give NAICC permission to use your photos as marketing and/or advertising for the organization.

The NAICC Photo Contest
winner for June's theme
Field Prep/Planting
was
One More Round
by Tim Dozier

Congratulations for winning
the gift card with this
great photo!



Honorable Mentions for June's contest are photos by Linda Goldschmidt (left) and Renee Daniel (below).

All photos submitted can be viewed at
<http://naicc.org/spring-2017-photo-contest/>



QA Corner:

Let's Meet in the Middle

By Torrance Lee, QA Specialist III, Valent U.S.A. LLC

It seems everywhere we turn, there are deep divisions within this country. In addition to politics, we often find divisions within our personal and work lives. While it is important to speak our minds and to be passionate in expressing our beliefs, holding tightly onto our principals can sometimes become very costly. When there are disagreements, we must ask ourselves, does the benefit outweigh the cost?

Living in a deep blue state, I often find that others view my conservative beliefs as being archaic, intolerant, ignorant, and perhaps hateful. While I do not expect the progressives to agree with me, at least they should spend some time listening to what I have to say. And not just to hear the words, but to understand where I am coming from. How often do we listen to formulate a counter argument rather than to listen for empathy? Far too often we talk past each other, rather than open our hearts and minds to other possibilities. Not everything has to be an argument or a debate. Therefore, how can we hope to meet in the middle until we listen with the goal of truly understanding?

The same divisions may exist in the field, office, or in the laboratory environment. Even with mutual respect, there are likely divisions between quality assurance, laboratory scientists, and field researchers. These divisions are the result of our lack of understanding, and of our unwillingness to step outside our comfort zone. While I may never be an expert agronomist or

metabolism chemist, I will always make a concerted effort to deepen my understanding of other fields. While it may be frustrating at first, I find that my efforts pay huge dividends. Oftentimes, I find that even a little knowledge goes a long way. While the GLPs must not interfere with the science, understanding the science is critical for me to become a successful and effective quality assurance professional.

During my time in college, I made it my mission to acquire knowledge and to increase my understanding. I felt more at ease learning biology and chemistry, but uncomfortable when I was taking philosophy or English classes. It became especially uncomfortable when I was taking a history of philosophy class surrounded by those majoring in philosophy. While the class was tremendously difficult, I stuck with it. While I will never be an expert in the humanities, that class transformed me in ways I never expected. I became a different person who viewed the world through a fresh perspective.

Whether in the field or in the lab, we each play a unique and important role in the study. While we take pride in perfecting our craft, we will always be limited until we understand the different components of each study. Do not hesitate to pick up the phone and reach out to the experts. Let us acknowledge our limitations and make the time to reach out to those who can help us understand. And it may feel awkward and uncomfortable at first. Just like me, you will be surprised that a little knowledge goes a long way. Asking the right questions at the right time can prevent disasters from occurring. Also, increased understanding often results in a fresh perspective. That new perspective can increase efficiency and improve quality. Therefore, we must actively listen to understand others - listening with open minds (without prejudice or bias). At the end of the day, we all want to win. To do this, we must meet in the middle.

In Memory

It is with great sadness that we report the loss of Henry Hagwood, a friend to many NAICC members. Henry was QA at American Ag for a long time and also did The Carringer's, Inc., facility audits for years. He was loved by all that knew him. Below is his obituary.

Henry Bryant 'HB' Hagwood, 78, passed away Sunday June 11, 2017 at his home surrounded by family. He was born September 10, 1938 in Lacrosse, Virginia to the late Henry Kelly and Lillian Brown Hagwood.

Henry grew up in Raleigh, NC and graduated from Broughton High School. After spending four years in the US Navy Submarine service, he returned to Raleigh where he met and married his beloved wife of 54 years, Judy Arrington Hagwood. Henry went on to receive both his Bachelors and Master's degrees from North Carolina State University. His first job with the Agriculture Extension Office brought him to Oxford in 1973, and he spent the majority of his career working in the agricultural chemical industry. His work led to worldwide travel and interesting stories of which Henry was very proud.

Memorial services will be held Saturday, June 17, 2017 at 1:00pm at Oxford United Methodist Church by Pastor Jenny

Wilson. The family will greet friends and family at a reception in the church fellowship hall immediately following the service.

In addition to his parents, Henry is preceded in death by his son in law Mark Baxter, and siblings June Hagwood Smith, Derle Grey Hagwood, and Ray Gordon Hagwood.

Henry is survived by his wife of 54 years, Judy Arrington Hagwood, and his daughters Leigh Hagwood Baker and husband Dean, and Ashley Hagwood Baxter. He is also survived by his granddaughters Sydney and Lauren Baker, who adored their 'Poppa B'.

Henry was an avid Wolfpack fan, a proud member of the US Submarine Veterans-NC Tarheel Base, the American Legion, and Oxford United Methodist Church where he served as an usher for many years.

The family would like to express their gratitude to his wonderful Hospice caregivers and friends and neighbors that cared for Henry during his illness. In lieu of flowers memorial contributions can be made to the USO at www.uso.org, Duke HomeCare & Hospice Office of Development 4321 Medical Park Dr, Suite 101, Durham, NC 27704, or Oxford United Methodist Church PO Box 757 Oxford, NC 27565.



NAICC PRIDE

Show your NAICC pride by adding a tag line promoting your profession and the Alliance. President Steve Hoffman has issued a challenge to all NAICC Members! The person who promotes NAICC now through the end of 2017 in the most unique way or using the most different types of media will win complementary registration for the 2019 NAICC Annual Meeting in Savannah, GA! Winners will be announced at the Saturday morning group breakfast during the 2018 Annual Meeting in Tucson.

Voting Members – if you would like to use the NAICC logo and need a jpg file, email allisonjones@naicc.org. Sustaining Members can also request the NAICC Sustaining Member's logo (shown above).

Below are a few suggestions for tag lines on your email, business cards, letterhead, etc.

1. Proud Member of NAICC Since ____
2. Proud Member of (logo) Since ____
3. (just logo)
4. Join me in Tucson in January 2018 for the NAICC Annual Meeting and AG PRO EXPO

These are just a few of the many ways we can promote NAICC and agriculture. Get creative!

Be sure to send a photo or your "NAICC Pride" tag line to AllisonJones@NAICC.org.

The correct answer from the May newsletter was
Dr. Emmett Brown
(from the Back to the Future trilogy).

Congratulations to Corey Rozenboom
for winning the gift card!

Answer the following question for a chance to win a
\$50 Visa Gift Card:

What is the name of the artist who created this
famous surrealist painting?



Submit your answer here:

<https://goo.gl/forms/t9csn4NSoepwuj11>

One winner will be randomly selected from the
correct answers and announced in the
next newsletter.

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NEONICOTINOID INSECTICIDES: What EPA needs to know!

Good for farmers, good for the economy, good for communities

Background

Neonicotinoid insecticides, introduced in the mid-1990s, have become vital tools in agriculture and the largest selling insecticide class in the world. Commonly called “neonics,” they can be used on a number of crops as a seed treatment, foliar application and soil application. However, most neonics – more than 90 percent — are used to treat seeds to protect them from destructive insects that hide below ground.

A comprehensive, 16-report study by AgInfomatics, released in 2014 and 2015, showed neonicotinoid insecticides increase crop yields, add billions of dollars to the economy and benefit entire communities, not just farmers. The research reports, along with news releases, fact sheets, infographics and videos, are available at GrowingMatters.org. *More information on neonics is listed at the end of this document.*

Registration review

The neonicotinoid class of insecticides is undergoing registration review, an extensive scientific process EPA conducts on every registered pesticide every 15 years. This multistep process typically takes five to eight years.

EPA plans to review all neonics in the same timeframe to ensure consistency across the class. As risk assessments are completed, the Agency will pursue risk mitigation, as appropriate.

Active Ingredient (a.i.) & Docket Number	Planned Completion	Review Timelines
Imidacloprid EPA-HQ-OPP-2008-0844	2018	<ul style="list-style-type: none"> • Preliminary pollinator-only risk assessment issued for public comment in 2016. • Preliminary aquatic-only ecological assessment issued for public comment in January 2017. • Potential early pollinator mitigation in 2017. • Preliminary human health risk assessment will be issued for public comment in 2017. • Updated pollinator and remainder of ecological risk assessments will be issued for public comment in 2018.
Clothianidin EPA-HQ-OPP-2011-0865 Thiamethoxam EPA-HQ-OPP-2011-0581 Dinotefuran EPA-HQ-OPP-2011-0920	2018	<ul style="list-style-type: none"> • Preliminary pollinator-only risk assessment issued for public comment in January 2017. • Potential early pollinator mitigation in 2017. • Preliminary human health risk assessment will be issued for public comment in 2017. • Updated pollinator and remainder of ecological risk assessments will be issued for public comment in 2018.

Bayer CropScience - Syngenta - Valent U.S.A.

Registration review includes the following neonic brands:

- Imidacloprid – Bayer’s **Admire® Pro, Gaucho® (600, XT), Leverage 360, Velum® Total.**
- Clothianidin – Bayer’s **Poncho®, Poncho®/VOTiVO, Poncho® Beta, Prosper® EverGol®, Sepresto 75WS, Emesto Quantum.** Valent’s **NipsIt INSIDE®, NipsIt® Suite, INOVATE®, INTEGO®, Belay® Insecticide.**
- Thiamethoxam – Syngenta’s **Actara®, Platinum®, Cruiser® FS, CruiserMaxx®.**
- Dinotefuran – Valent’s **Venom® Insecticide.**

As part of this multistep process, EPA is now seeking public comments on the current neonicotinoid risk assessments, highlighted in red in the chart above and posted on the individual a.i. dockets. **The dockets will remain open through July 24, 2017.**

Your role

Because EPA receives many comments from environmental groups about restricting neonics, it’s important for the Agency to hear from people who actually use these products. As a grower, crop leader and neonic user, you have valuable information that will help EPA understand their importance to your operation

- How many acres do you farm? Where is the farm located? What kinds of crops do you grow?
- How do you use these products: seed treatment, foliar application and/or soil application?
- Why do you use these insecticides? How do they benefit your farming operation?
- If these products were no longer available for use, what effect would that have on how you farm: What other products would you need to use? Would you need to change from seed treatment/soil applications to foliar sprays? Would you need to spray more often, etc.?
- *Consider closing with:* “We know these are preliminary risk assessments. We trust EPA will refine, as necessary, based on sound science and field data and think through IPM and resistance management requirements.”

To post a public comment, respond by July 24:

1. Please post comments on **each a.i.** (can be the same comments) by clicking on the correlating docket number in the chart above, i.e. **EPA-HQ-OPP-20__-_____.**
2. This takes you to the individual a.i. registration review page (shown below). Then click on the dark-blue box, “Comment Now!”



3. The next screen shows: “You are commenting on.” Enter comments in box – 5,000 character limit. You have the option of uploading files. When finished, press “Continue” button on bottom right.
4. Next, you can preview and edit comments. You must check the box, “I read and understand the statement above,” before you can click “Submit comment.”
5. The next page provides a receipt number to verify your comments have been received by EPA.

Key facts about neonicotinoids

- Scientific evidence clearly shows that bees and other pollinators can coexist with applications of neonicotinoid insecticides, when used according to label.
- Neonicotinoids are a critical element in integrated pest management (IPM) programs.
- The loss of neonics would result in higher costs, reduced yields and more frequent sprays – all a serious setback to IPM and resistance-management programs.
- Neonics provide selective control of pests, helping ensure beneficial insects remain available to keep other potential pests in check.
- Neonicotinoids represent one of three significant classes of insecticide chemistry, along with pyrethroids and organophosphates, used in rotation within resistance management programs.
- Without neonics, crop yields and quality would decrease and, in some cases, catastrophic damage would result due to the lack of alternatives to manage invasive insect pests.
- Neonicotinoid insecticide use leads to average yield increases from 3.6 percent to 71.3 percent in eight major crops in North America.
- The average yield benefit of using neonicotinoids far exceeds the cost of treatment and delivers a substantial economic return on investment to the farmer.
- If neonicotinoids were not available, growers would incur a projected net-cost increase of \$848 million per year due to:
 - Increased spending on insecticides - \$157 million
 - Increased spending on applications - \$383 million
 - Increased spending on foliar scouting - \$210 million
 - Increased seeding rates/replanting costs - \$97 million
- Replacing neonics in commodity crops would cost U.S farmers nearly \$850 million due to:
 - Higher costs of alternative products.
 - Higher application costs associated with more frequent spraying.
 - Higher scouting costs.
 - Increased seeding rates and/or replanting costs to offset seedling damage.

Thank you for your valuable support. Registration review is a multistep process that will continue to require your assistance periodically.

Important links:

www.GrowingMatters.org

www.AgInfomatics.com