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April 20, 2018

ELECTRONIC DELIVERY

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW. Washington,
D.C. 20460-0001

Submitted via Federal eRulemaking Portal

Re: EPA's Registration Review Update for Four Neonicotinoid Insecticides; Docket ID Nos. EPA-HQ-OPP-2008-0844; EPA-HQ-OPP-2011-0865; EPA-HQ-OPP-2011-0581 and EPA-HQ-OPP-2011-0920

The following comments are submitted on behalf of the National Potato Council (NPC). NPC represents more than 90 per cent of the potato growers in the United States. Potatoes have a farm gate value of over \$4 billion dollars, with processing and other value-added activities increasing that amount dramatically beyond the farm gate.

Neonicotinoids are an extremely important part of the pest management programs for potato growers. The vast majority of potato growers utilize IPM crop protection systems to keep pests below economic thresholds and rotate chemistries to prevent resistance development. Potato growers utilize neonicotinoids as a seed treatment and as a foliar-applied protectant. Due to the importance of neonicotinoids, growers are particularly careful to employ use patterns that reduce the potential for pests to develop resistance.

It is important to note the potatoes are not a preferred forage source for bees or other pollinators. Therefore, neonicotinoids applied to potatoes are unlikely to contact bees or other pollinators. This should be considered by EPA when risk factors are identified and mitigation measures or label descriptions are developed.

A risk assessment that is based on the best available data, using sound science is a critical component of the regulatory structure of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Consideration of the benefits as required under FIFRA is the other unique and important aspect of this statute.

The following observations are offered to improve the risk assessment process;

Based on discussions with the registrants it appears that EPA has both lower and higher tier data available to them on the neonicotinoid registered products. Analysis of the higher-tiered data drawn from real world environments should be used to evaluate the neonicotinoids. This is particularly necessary in the case of the neonicotinoids, given the history of the debate on the use of this chemistry and the claims made related to their impact, and other pesticides' impact on pollinator health. The review and use of higher tier data from wildlife field trials and water residues should be used to inform the final risk assessment.

It appears the exposure estimates utilized by the Agency could lead to an over-estimation of the actual risk from neonicotinoid use. This can easily result from erroneous assumptions related to use rates and application frequency. During product reregistration and registration reviews for other products, NPC has pointed out to EPA that it is unlikely and inconsistent with actual practices in the field for growers to apply pesticides at maximum rates and for the maximum number of allowed applications. Assumptions for the neonicotinoids regarding use at maximum rates and number of applications are equally unlikely and unrealistic. We urge the Agency to revisit those assumptions.

NPC appreciates the opportunity to provide EPA with these comments.

Sincerely,

A handwritten signature in black ink that reads "John Keeling". The signature is written in a cursive, flowing style.

John Keeling
Executive Vice President and CEO