



Know your environment.
Protect your health.

July 21, 2017

To: The Environmental Protection Agency,
Office of Chemical Safety and Pollution Prevention
Wendy Cleland-Hamnett, Acting Assistant Administrator
Rick P. Keigwin Jr., Acting Director, Office of Pesticide Programs

RE: Dockets EPA-HQ-OPP-2011-0865, EPA-HQ-OPP-2011-0920, EPA-HQ-OPP-2008-0844, EPA-HQ-OPP-2011-0581

On behalf of our organization and 122,210 supporters, the Environmental Working Group is providing comments for the Environmental Protection Agency's ongoing assessment of the ecological risks of four neonicotinoid pesticides: imidacloprid, clothianidin, thiamethoxam and dineotefuran.

A decade of research has made it clear that neonicotinoids are highly toxic to honeybees and other pollinator species. Mounting evidence suggests that stresses caused by neonicotinoids play at least a contributory role in the colony collapse plaguing global honeybee populations, and neonicotinoids likely affect aquatic species as well. Commercial use of honeybees as pollinators is a large, essential part of the nation's agriculture. Even more essential are the more than \$17 billion worth of agricultural crops in the United States that depend on pollinators. Continued use of neonicotinoids could cause serious economic consequences for American agriculture, in addition to severe adverse effects on the wild plants and animals that live in the vicinity of the crops.

Key American trading partners, the European Union and Canada, have already taken steps to limit neonicotinoid use. The EU imposed a temporary ban on three neonicotinoids – imidacloprid, clothianidin and thiamethoxam – in 2013¹ and is considering a complete ban on all outdoor uses. In fall 2016, the Canadian government proposed a ban on most uses of imidacloprid, based on threats to aquatic communities.²

Due to delays on the federal assessment of neonicotinoids, which have lagged since initial assessment of aquatic risk for imidacloprid in 2008, states are moving to take

¹ European Commission. 2013. Bees & Pesticides: commission to proceed with plan to better protect bees. April 29, 2013. Available: http://europa.eu/rapid/press-release_IP-13-379_en.htm

² Health Canada. 2016. Proposed Re-evaluation Decision PRVD2016-20, Imidacloprid. November 23, 2016. Available: <https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/consultations/proposed-re-evaluation-decisions/2016/imidacloprid/document.html>



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action. In 2016, the state of Minnesota moved to limit all nonessential uses of neonicotinoids to protect pollinators.³ It now comes to the EPA to take leadership in protecting American farming and pollinators from negative effects of these pesticides.

EWG urges the EPA to swiftly complete its multiyear assessment by addressing all cumulative ecological impacts of neonicotinoids. Further, the agency already demonstrated that the major use of neonicotinoids as seed treatments poses little or no benefit to soybean crops – a finding which likely applies to treated corn seed as well. There is no reason to continue the use of these treatments given their inefficacy, and their risk to pollinators and the environment.

EWG and our 122,210 supporters implore the agency to take immediate action to restrict unnecessary uses of neonicotinoids, particularly on pre-treated soybean and corn seeds. USGS estimates that nearly a million pounds of imidacloprid were used on soybeans in 2014, and more than 3 million pounds of clothianidin were used on corn.⁴

Please see the attached comments of 122,210 EWG supporters who share our concerns, and urge the EPA to immediately restrict all nonessential uses of neonicotinoids to protect the American agriculture from harm caused by pollinator loss in this country.

Sincerely,

On behalf of the Environmental Working Group
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Attachment: Letter from 122,210 EWG supporters urging EPA to enact immediate restrictions on neonicotinoid uses to protect pollinators and aquatic species

³ Minnesota Department of Agriculture. 2016. Special registration review of neonicotinoid insecticides. August 2016. Available:
<http://www.mda.state.mn.us/chemicals/pesticides/regs/scopingneonics.aspx>

⁴ U.S. Geologic Survey. 2014. Estimated Annual Agricultural Pesticide Use. National Water-Quality Assessment Project. 2014. Available:
<https://water.usgs.gov/nawqa/pnsp/usage/maps/index.php>