



May 4, 2020

Mary Reaves
Acting Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW,
Washington, DC 20460-0001

Re: Docket Number: EPA-HQ-OPP-2011-0865-1161

Dear Acting Director Reaves:

Thank you for the opportunity to comment on the Proposed Interim Decision for Thiamethoxam & Clothianidin (Docket Number EPA-HQ-OPP-2011-0865-1161). The National Association of Wheat Growers (NAWG) is a federation of 20 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research and sustainability.

Thiamethoxam, Clothianidin and other treated seeds provide wheat growers the ability to protect their crop from early season pests, pathogens and diseases. Using a treated seed allows for protection of the seed and plant and reduces the need to treat the crop later in the season. The use of this crop protection tool is balanced with the threat of crop damage, environmental impacts and economics of treatment vs. crop damage from no treatment. Growers also take other factors into consideration before using any crop protection product including their crop rotation, weed and pest pressure and efficacy and cost.

Wheat growers understand the importance of following safety precautions and requirements set out by EPA and State Agencies. Any pesticide is used only when necessary to ensure the viability of the crop and the decision to apply pesticides or use treated seeds must be economically viable considering all the costs of production and

the expected price received for the harvested crop. These considerations are at the forefront of wheat growers' mind due to several years of continuous low commodity prices.

NAWG members adhere to state requirements and pesticide applicator certifications, undergoing training and educational programs on seed spills and what to do in case of a spill. NAWG also works with the American Seed Trade Association to distribute information on stewardship of treated seeds to our member state associations and growers.

NAWG requests that certain areas of the PID be clarified including the wording on droplet size and vegetative buffer requirements. While wheat growers' use of clothianidin today is through treated seeds, we believe the language in this document should provide clear direction to farmers. Section 10 addressing spray drift and runoff reduction reference to a vegetated buffer requirement is for all agricultural uses (page 69), while the proposed label in Appendix B specifies that the vegetated buffer requirement is specific to foliar applications. The text on page 69 of the PID should be modified for specific references to foliar applications, not all agricultural uses. Additionally, NAWG recommends the references to droplet size be modified to state nozzle size instead of droplet.

Thank you for the opportunity to comment on the Proposed Interim Decision for Thiamethoxam & Clothianidin.

Sincerely,

A handwritten signature in blue ink that reads "David Milligan". The signature is written in a cursive style and is positioned above a horizontal line.

David Milligan
President
National Association of Wheat Growers