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# OREGONIANS FOR FOOD & SHELTER

1320 Capitol Street NE ♦ Suite B-50 ♦ Salem, Oregon 97301

A non-profit coalition to promote the efficient production of quality food and fiber while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology.

August 31, 2020

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

**Re: Petition to Revoke All Neonicotinoid Tolerances, Docket Identification (ID) number EPA-HQ-OPP-2020-0306**

Ms. Reaves:

Thank you for the opportunity to comment today. Oregonians for Food and Shelter (“OFS”) is a non-profit coalition aimed at promoting the efficient production of quality food and fiber in Oregon while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology. Our members include growers, food processors, forest products companies, professional applicators, and other organizations whose operations depend on the safe and responsible use of effective pest management technology and strategies.

OFS urges the Environmental Protection Agency (“Agency”) to deny the request to revoke all tolerances for residues of the neonicotinoid pesticides acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam. The Agency has satisfied its review requirements and provided sufficient opportunity for public comment. Both the extensive agency review and the solicitation of public and scientific feedback provide a sufficient legal basis for the Agency to approve food tolerances for these chemistries following its registration review process.

Neonicotinoids have been widely adopted by Oregon growers because of their use in integrated pest management (“IPM”) programs. These products have largely replaced many older insecticides because of their effectiveness in pest management programs and favorable mammalian safety and environmental profile. Because of their selective control of harmful insect pests, these products help ensure important beneficial insects remain available to keep other potential pests in check. Although there may be other insecticides that control similar insect pests, neonicotinoids are the primary defense against some invasive species that can cause catastrophic damage if left untreated.

The Agency has conducted a thorough examination of the neonicotinoid pesticides acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam. Petitioners are asking for a revocation counter to the extensive scientific review during the registration review process in 2017. The Agency has already held two open comment periods to allow the public to provide feedback on available scientific analysis—first in 2008 when the Agency initiated its registration review and subsequently through

the investment of significant resources in developing and publishing its preliminary risk assessments for pollinators from 2016-2017, aquatic species in 2017, and human health in 2017. Final risk assessments and Proposed Interim Decisions (PIDs) were released in 2020 as part of the final registration review. OFS provided comments on the PIDs earlier this year.

The potential risks to human health have also been reviewed extensively. The human risk assessments included the Preliminary Human Health Draft Risk Assessment for Registration Review, Acute and Chronic Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for the Registration Review, and Imidacloprid Occupational and Residential Exposure Assessment for Registration Review were all completed in 2017 followed by a 60-day public comment period. In addition, the Biological and Economic Analysis Division of the Office of Pesticide Programs undertook crop-specific benefits and economic impact analyses, which were published in 2014 and 2017. Those analyses were followed by the Agency's eight crop-group use, benefits, and mitigation assessments, published in 2019 and 2020. This robust process not only called for formal comment but also solicited significant stakeholder review during all of these analyses.

The petition to revoke all neonicotinoid tolerances is unwarranted. The Agency very clearly followed the established process under the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA"). The Agency has completed a thorough review of the products, provided adequate notice to the public, and provided ample opportunity for public comment and additional information. The petition is without merit and will result in significant, negative impacts to insect control and Oregon's agricultural operations as a whole. Delaying the neonicotinoid registration review will also slow additional Agency work on other registration decisions critical to growers across our state and the country.

We believe the Agency has followed the Administrative Procedures Act and established a sufficient basis for its determinations. For these reasons, the tolerances developed as part of the review should not be revoked.

Thank you for the opportunity to provide comments on Docket Identification (ID) number EPA-HQ-OPP-2020-0306, the Petition to Revoke All Neonicotinoid Tolerances.

Sincerely,

A handwritten signature in black ink, appearing to be 'JD', with a long horizontal stroke extending to the right.

Jenny Dresler  
Executive Director  
Oregonians for Food and Shelter