



*Arizona Farm Bureau Federation*

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March 26, 2019

Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

**RE: Docket: EPA-HQ-OPP-2018-0805**

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our members are directly affected by EPA's policies with respect to the regulatory treatment of treated seeds. We appreciate your consideration of these comments in response to the petition filed by the Center for Food Safety (CFS).

As a member of the American Farm Bureau Federation (AFBF), we support the comments they have submitted to this docket and concur with their request that the EPA reject the petition submitted by the CFS. The CFS petition requests the agency reinterpret the Treated Article Exemption (40 CFR 152.25) and revise its regulatory regime to require each treated seed be considered a pesticide product with a separate registration and label. Should EPA grant the pending petition, we have little doubt that farmers would face a challenging – and costly – set of consequences. For many producers in a wide range of crops (e.g., corn, cotton, etc.) utilization of treated seed is an important element in the spectrum of tools available to farmers to help maintain economic viability.

Farmers have adapted to the use of seed treatment technology since its introduction technology several decades ago. The benefits of the technology are well-documented and testify to its benefits for the agricultural community

We urge the EPA to deny the petition and to continue to make this technology available to agricultural producers.

Thank you for considering these comments.

Sincerely,

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation