



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

May 4, 2020

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket Nos. Proposed Interim Decision for:

EPA-HQ-OPP-2011-0865 (Clothianidin)
EPA-HQ-OPP-2011-0920 (Dinotefuran)
EPA-HQ-OPP-2008-0844 (Imidacloprid)
EPA-HQ-OPP-2011-0581 (Thiamethoxam)

Dear Sir or Madam:

The Arizona Farm Bureau represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion in economic impact to the state. Many of our members rely on neonicotinoid pesticides as a crop protection tool to produce high quality crops and sustain their operations. Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision for the several neonicotinoid pesticides including clothianidin, dinotefuran, imidacloprid, and thiamethoxam.

In previous comments submitted by the Arizona Farm Bureau regarding the draft ecological non-pollinator risk assessment for the registration review of imidacloprid and the draft human health and non-pollinator ecological risk assessment for the registration review for of clothianidin, thiamethoxam, and dinotefuran (Docket ID # EPA-HQ-OPP-2011-0920-0604), we noted the importance of these products to address pest infestations and damages occurring in a number of Arizona's major crops – leafy greens, melons, cotton, and citrus. We request incorporation of these previous comments for consideration in EPA's current comment period.

In the proposed interim decision, the primary concern that has been raised by several pest control advisors is the proposed reductions in maximum annual application rates that is recommended for each of the aforementioned neonicotinoids. Below is a table noting the Arizona crops impacted by the application rate reductions.

	Arizona Crop(s) impacted by reduced annual application rates
Clothianidin	Cotton
Dinotefuran	Leafy vegetables, brassica/cole, and cotton
Imidacloprid	Leafy vegetables, brassica cole, and cotton
Thiamethoxam	Cotton

The reduction in the annual allowed usage is concerning as it does not account for years when pest populations are higher than normal. Each growing season is unique in regards to the severity of pest issues. In a year where pest infestations are high a reduction in maximum application rate may result in an inability to adequately control pests. The reduced application rates may also result in decreased efficacy and length of control leading to a need for additional control measures and/or application of other pesticide products. For these reasons we recommend EPA not implement the reductions in maximum application rates.

Additionally, as members of the American Farm Bureau Federation, we support the comments they have submitted regarding each of the neonicotinoids referenced in this letter.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation