



Arizona Farm Bureau Federation

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Gilbert, AZ 85296

August 31, 2020

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

RE: Docket No. EPA-HQ-OPP-2020-0306; Petition to Revoke All Neonicotinoid Tolerances; Notice of Availability

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 petition to revoke all neonicotinoid tolerances referenced in docket EPA-HQ-OPP-2020-0306.

The Arizona Farm Bureau has submitted comments twice before on the importance of neonicotinoids, specifically clothianidin (Docket ID EPA-HQ-OPP-2011-0865), dinotefuran (Docket ID EPA-HQ-OPP-2011-0920), imidacloprid (Docket ID EPA-HQ-OPP-2008-0844), and thiamethoxam (Docket ID EPA-HQ-OPP-2011-0581). Each of these neonicotinoids are important to the successful cultivation of staple crops in Arizona including leafy greens, cole crops, melons, cotton and citrus.

In our earlier comments we noted that the neonicotinoids are effective in combating various pests that can cause severe damage to crops. These products are also an important component of resistance management programs and help ensure a variety of alternative chemistries are available for use. Not having these products available would result in the use of older, more broadly toxic insecticides. In some cases, the alternative products are not as effective, which would result in the need for additional applications of the older chemistries.

For these reasons we do not support the petition and encourage the EPA retain the tolerances for each of the noted neonicotinoids. As we have stated before, clothianidin, dinotefuran, imidacloprid, and thiamethoxam are important pest management tools for many growers in our state and we do not believe that these products, which have been used for a number of years, pose any unreasonable risk to health or the environment. All crops grown in Arizona on which clothianidin, dinotefuran, imidacloprid, and thiamethoxam are used would be negatively impacted if they were no longer available as crop protection tools. We urge the EPA to retain the current tolerances for these products.

We support the comments submitted by the Arizona Pest Management Center which further reinforce the importance of neonicotinoids on Arizona crops. Additionally, as members of the American Farm

Bureau Federation (AFBF), we support the comments they have filed separately to the docket. AFBF's comments recognize and support the robust, scientific process the Environmental Protection Agency utilizes in the registration review process to which the aforementioned neonicotinoids have been subject.

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