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March 26, 2019

Mr. Richard Keigwin  
Director, Office of Pesticide Programs  
C/o OPP Docket  
Environmental Protection Agency Docket Center (EPA/DC) (28221T)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460-0001

Re: Comments of the National Onion Association regarding pesticides; Petition Seeking Rulemaking or Formal Agency Interpretation for Planted Seeds Treated with Systemic Insecticides; Request for Comment, (the "Petition") --

EPA-HQ-OPP-2018-0805

Dear Mr. Keigwin,

The National Onion Association is a not-for-profit trade organization representing more than 500 onion growers, suppliers, and equipment dealers across the country.

The NOA strongly recommends that the agency deny the petition, as it is not supported by reliable evidence, it is overreaching and it is unnecessary. Adopting it would be an incredible burden on America's onion growers in added regulation, and it would not at all be beneficial to the environment.

We understand that the EPA must only authorize pesticides that do not represent an unreasonable threat to humans and the environment under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).

The Center for Food Safety (CFS) petition only considers neonicotinoid use and the CFS's perceived risks of those insecticides. CFS does not take a more comprehensive view of what would happen to agriculture, agricultural workers, and the environment with the effective elimination of neonicotinoid seed treatments that it proposes.

The use of insecticides in seed treatments does not go against IPM principles (p. 12 of CFS petition). The primary pests that these seed treatments target in onion are the onion and seedcorn maggot. They also protect against wireworms. Onions are most susceptible to these pests are in the first few weeks after seeding. Because maggots and wireworms burrow through the soil, there are no viable therapeutic (rescue) treatments that can be applied before economic damage occurs. The most effective management tactic is to have an insecticide in place at planting. With seed treatments, lower total amounts of insecticides can be applied to a field than with older techniques, such as in-furrow sprays or broadcast sprays that are incorporated into the soil before planting. Seed treatments also allow insecticides to be applied in manner that reduces farm worker exposure in handling and application operations.

The CFS petition seeks to revoke the “treated article exemption” for treated-seed, but treated seed does meet the three requirements of the treated article exemption. The neonicotinoid insecticides under consideration are currently registered by the EPA for these intended uses. Botanically speaking, a seed contains an embryonic plant so that the seed coating provides long-acting protection to the developing plant (i.e., the seed treatment protects the article itself).

If EPA accepts the CFS argument that insecticides should not be applied to protect a later stage of the plant, it would inhibit the use of any pesticide with systemic activity. These materials offer long-term protection against pests as plants develop. Again, the use of seed treatments ultimately reduces overall pesticide use. Making it more difficult to use these registered products in already approved application methods will lead to greater crop losses and force growers into making more, but less effective, pesticide applications.

The current regulatory framework on treated seeds was established in 1988, and it has worked. We believe the petition should be categorically denied, as the EPA long ago established the treated article exemption was warranted for seed that has been treated with a registered pesticide. If it’s not broken, don’t fix it.

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