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December 22, 2014

U.S. Environmental Protection Agency
Docket ID #EPA-HQ-OPP-2014-0737
Washington, DC 20460-0001

RE: EPA-HQ-OPP-2014-0737 "Benefits of Neonicotinoid Seed Treatments to Soybean Production"

To Whom It May Concern:

New York Farm Bureau, the State's largest general farm organization, appreciates this opportunity to provide comments on the Environmental Protection Agency's Biological and Economic Analysis Division (BEAD) published memorandum entitled "Benefits of Neonicotinoid Seed Treatments to Soybean Production."

Our membership includes farmers engaged in the production of soybeans and corn who utilize treated seed to help reduce or eliminate pests. Also included in our membership is a far broader spectrum of producers, including beekeepers and orchardists who rely on pollinator services provided by beekeepers, who will be directly affected by the decisions EPA may make in connection with the use of and availability of neonicotinoids.

On behalf of all of our members, we urge EPA to proceed judiciously and cautiously in its evaluation of neonicotinoids. We are particularly concerned that this paper may lead to unwise and unjustified restrictions on the use of neonicotinoid seed treatments and we would strongly oppose any such outcome. We do not feel that this paper justifies any change in the legal use of neonicotinoid-treated seeds.

We understand that the EPA has a statutory obligation to examine and evaluate substantive issues related to neonicotinoids if such issues arise, however, to date we have seen little evidence that such allegations have merit. This paper has the potential to help inform the agency's thinking on this issue and it should be noted that the paper does not represent original research and it relies on a fairly limited set of papers. This set of papers is restricted to one crop, in one region, and only examines one particular aspect of the set of benefits provided by neonicotinoids. Although this paper may provide some limited insight when viewed in a broader spectrum of valid scientific studies, it cannot and should not be used as a starting point of discussion nor as a determining factor in banning or suspending the use of neonicotinoids.

New York Farm Bureau points to the limited focus of this paper, which only reviews one aspect of performance on one region and for one crop. We acknowledge the agency's obligation to uphold its statutory obligations in registering and reviewing, however, we believe that neonicotinoids provide extraordinary benefits for farmers. We look forward to working to craft sensible, and realistic policies

that hold real promise of addressing problems that affect honey bees. The removal or limited use of neonicotinoids would not provide this solution and we oppose such an effort.

Once again, we appreciate this opportunity to share our views with the agency and we look forward to continuing this dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean E. Norton". The signature is stylized, with a large, sweeping initial "D" and a long horizontal line extending to the right.

Dean E. Norton
President