



February 7, 2024

To: The Honorable Representative David Durfee
Chair of the Vermont House Committee on Agriculture, Food Resiliency, and Forestry
Re: Vermont House H.706

The American Seed Trade Association (ASTA) is writing this letter to submit comment for the public hearing called for February 9, 2024, on H.706 which would ban the use of neonicotinoid pesticides, an important component and critical seed treatment tool for agriculture production.

Founded in 1883, ASTA is one of the oldest trade organizations in the United States. Its membership consists of almost 800 companies involved in seed production and distribution, plant breeding, and related industries. ASTA is a diverse organization. It represents all types of seed companies and technologies – seed from alfalfa to zucchini, technologies from organic to biotechnology, and companies from “mom and pop” to multinationals. It works on behalf of all of its members at the state, national, and international levels. In other words, ASTA represents every seed company with interests in this discussion, and it works in cooperation with agribusiness and consumers, whom any proposed legislation would affect.

Seeds treated with neonicotinoid applications provide an important first line of defense from soil born pests and disease through germination and emergence. By helping protect the developing seedling during its most vulnerable time, today’s innovative seed treatments allow farmers to do more with less. For the environment, this means less impact on natural resources and non-target organisms. For farmers, it means less production costs, and higher, more consistent yields. For all of us, it means access to high-quality, affordable food we count on for our families.

In addition to their effectiveness, it’s important to note that — despite what you might read in certain media outlets — treated seeds are indeed highly regulated, just as foliar- and soil-applied pesticides are. The Federal Seed Act regulates the labeling, sale and movement of seed in the U.S. It’s important to note that federally approved labels must reflect the risk assessment and mitigation processes. These products must also undergo thorough evaluation by the U.S. Environmental Protection Agency (EPA) and applicable state agencies prior to commercialization and periodically thereafter.

As an industry, we know the value of treated seeds; and we know that policies that would take these tools out of the hands of growers would have devastating unintended consequences – for farmers’ livelihood, food security and environmental sustainability. Without treated seeds, farmers would be forced to rely on a few, older and less precise classes of chemistry. According to research by AgInfomatics, without seed treatment technology U.S. cropped land would need to increase between 340,000 and 410,000 acres to offset losses in yield and quality, much of which would come from the Conservation Reserve Program, environmentally sensitive land established to preserve water, soil and wildlife.

That is why ASTA continues to place a high priority on educating the general public and policymakers about treated seed – specifically around safety and efficacy. As we have these

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important discussions with policymakers, it's critical that we simultaneously continue to do our part to communicate along the entire seed treatment value chain, around the importance — and necessity — of proper stewardship. This has been an ongoing and longstanding commitment of our industry. Several years ago, ASTA in collaboration with industry and grower partners, developed the *Guide to Seed Treatment Stewardship* — a comprehensive set of best practices, for applicators and farmers, around the handling of treated seed. Along with the guide is a set of outreach and education tools, including handouts, videos and FAQs, available for use and download. Each spring and fall, ASTA engages in a targeted communications campaign to help remind industry and growers to follow all applicable laws and regulations around the safe planting, harvesting and disposal of treated seed.

Seed treatments allow for the precise application of biological organisms, products and/or chemical ingredients to suppress, control, or repel plant pathogens, insects, or other pests that attack seeds, seedlings or plants. In a very efficient manner, they help a developing seedling during its most vulnerable time and allow today's farmers to do more with less, and to meet new and emerging challenges. Without seed treatments, like neonicotinoids, farmers would be forced to rely on a few older classes of chemistry that are less selective.

Is neonic-treated seed necessary?

- Because some pests can damage the seed or seedling to the extent that there are no rescue treatment options available and the plants may either die or not produce a harvestable yield, seed treatments give farmers confidence that they are proactively managing early-season risk and minimizing the expense and environmental impact of replanting.
- Seed treatments enable earlier and faster planting; stronger, more uniform stands; optimal plant populations; and healthier plants that help increase productivity. Because some pests can damage the seed or seedling to the extent that there are no rescue treatment options available and the plants may either die or not produce a harvestable yield, seed treatments give farmers confidence that they are proactively managing early-season risk and minimizing the expense and environmental impact of replanting.

Do treated seeds impact the surrounding environment?

- Technology is used to protect pollinators, including enhanced coatings and application processes to increase pesticide adherence to seeds, as well as new flowability agents that help minimize seed dust-off during planting. Industry is constantly evolving to improve seed treatment processes such as:
 - Using closed application systems and continuously improving mixing and drying processes to create a better application of active ingredients to the seed.
 - Implementing an ISO planting equipment standard to better control dust emissions.
- Even after regulatory authorities approve a pesticide for use, they continue to consider new information to assess the safety of registered products. And no pesticide's regulatory approval is permanent. In the U.S., the EPA routinely reviews registered products to determine if they should be renewed.
- As consumers ourselves, we fully support the comprehensive and science-based processes used by the EPA and other regulatory authorities around the world to ensure these crop protection tools can be used safely.
- The EPA carefully considers effects on many non-pest organisms when they approve new insecticides for use. Following the directions for use on the registered pesticide product labels, as well as the precautionary and instructional information

provided on treated seed labels, mitigates exposure of the pesticide to non-pest organisms, including honeybees.

Do farmers have options to buy non-neonicotinoid treated seed?

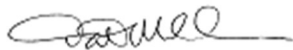
- Farmers definitely have options for buying non-neonicotinoid treated seed. Growers make these decisions with their seed supplier, and companies plan their production and offerings accordingly.
- For certain crops, farmers who wish to purchase non-neonicotinoid treated seed will need to discuss their order in advance because seed companies begin production 9-12 months prior to planting.

Seed treatment is an important practice of Integrated Pest Management (IPM) & Sustainability

- IPM is “a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks.” (Source EPA).
- In the case of seed treatment, either for soil dwelling pests or seedling pests it may not be possible to monitor the pest. However, the farmer can use other IPM tactics such as crop history, pest history and agronomic practices such as variety and planting dates as part of the overall IPM plan for the use of seed treatments.
- There are no rescue treatments for soil dwelling insects which is why farmers view neonicotinoid seed treatments as an important part of their pest management plan.
- Neonicotinoid seed treatments play a critical role in integrated pest management (IPM) programs, including less potential impact on beneficial insects in the field and decreased potential worker exposure. Such an IPM plan can be developed through monitoring fall crop yields, inspection for insect damage on harvested crop, soil sampling for soil born pests and reviewing weather data from the previous growing season.
- Neonicotinoid seed treatments selectively control insect pests, while helping ensure beneficial insects remain available to help keep other potential insect pests in check. This tool also provides a unique mode of action, necessary to managing pests resistant to other insecticides. Without neonicotinoids, farmers would be forced to rely on a few, older classes of chemistry that are less selective and more toxic.
- From a pest spectrum and resistance management perspective, having multiple tools for farmers’ pest management programs is important both for the farmer as well as for the longevity of the tools.

In summary, the use of seeds improved through modern technologies, such as seed treatments, is important as an Integrated Pest Management (IPM) tool and input directly affecting sustainability. Today’s farmers need access to every tool available, including the newest seed treatments to safeguard the long-term reliability of our food supply, the strength of our farms, and health of our planet. Please do not hesitate to contact us if you have any questions. Thank you for your consideration.

Sincerely,



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