College of Science
UtahStateUniversity

Department of Biology
5305 Old Main Hill
Logan, UT 84322
biology.usu.edu
(435) 797-0776

February 9, 2024

Susan Bartow
Chemical Review Manager
Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Ms. Bartow,

Utah State University's Extension team, "Utah Pests" is host to the University's expert IPM scientists including entomologists, plant pathologists, and weed specialists with expertise in the use of pesticides in IPM programs that protect both environmental and economic concerns of stakeholders. In coordination with the Western Integrated Pest Management Center, we contribute to EPA comments on pesticide changes on behalf of stakeholders in Utah, Wyoming, Colorado, and Montana. We are writing at this time in response to EPA's Review of Requirements Applicable to Treated Seed (EPA-HQ-2023-0420).

To obtain feedback, we delivered a survey to 102 experts (crop consultants, extension specialists, researchers) and growers in the states listed above, and received 23 responses. The questions asked about their use and usage of treated seed, including storage, planting, and disposal. The feedback from the survey demonstrated that the majority of acres planted with treated seed in these states are planted with wheat, sorghum, corn (field or sweet), and soybean. Sunflowers, fruits, and vegetables were also planted with treated seed in these states.

When asked if they were aware of what active ingredients were applied to the treated seeds they plant, 100% of farmers/ranchers marked that yes, they were aware. In addition, 83% of consultants and extension professionals felt that the producers they worked with were aware of active ingredients. Some commonly mentioned active ingredients included mefenoxam and thiamethoxam. The survey results also revealed the majority of the participants (69%) were not opposed to treated seed being subject to pesticide registration and reporting requirements.

Our survey results showed that respondents properly dealt with excess seed. The majority of the time excess seed was either returned to the sender (39%) or stored for future use (33%). Other actions included planting on unused or fallow land (22%) or given to a disposal agency (6%). No respondents marked that they buried, burned, composted, or disposed of excess treated seed in a landfill (Fig. 1).

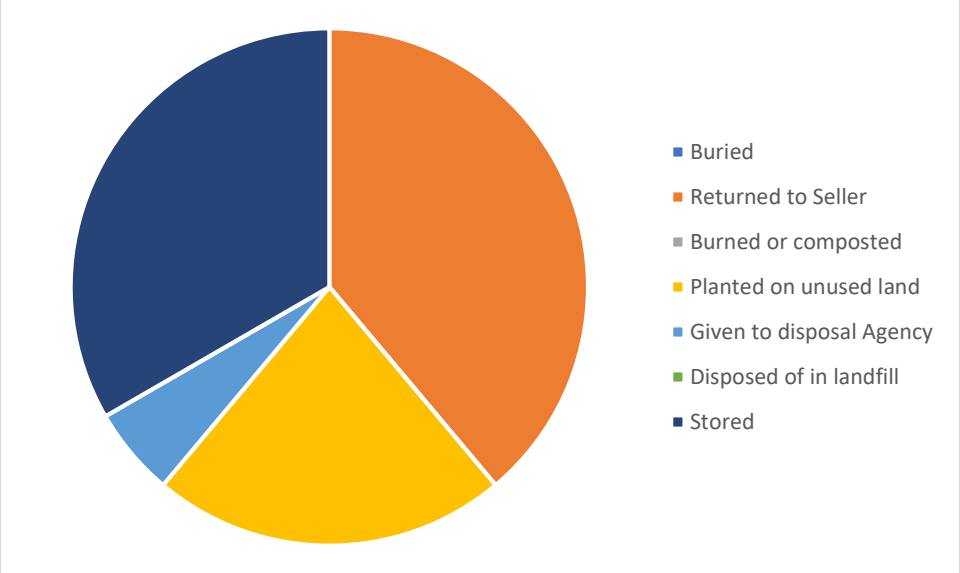

Fig. 1. How survey respondents chose to dispose of excess treated seed.

A few respondents commented that they were concerned about the misuse of treated seed in regards to spilled seeds left in fields and one stated, "*Always a bit of a concern with seed spills if they get cleaned up and buried or disposed of properly*". It was also conveyed that a portion of stakeholders feel that the current treated seed labels are "somewhat unclear" on what to do with spilled seed (31%) and somewhat unclear on best practices for proper disposal (31%). However, no respondents marked that the labels were "very unclear" and all other aspects of the label (proper planting, proper storage, use in/around conservation areas, use around water bodies, best practices for reducing dust-off) were not areas of concern with more than 75% marked as "clear" (Fig. 2). Only 13% felt that more specific label requirements were needed overall.

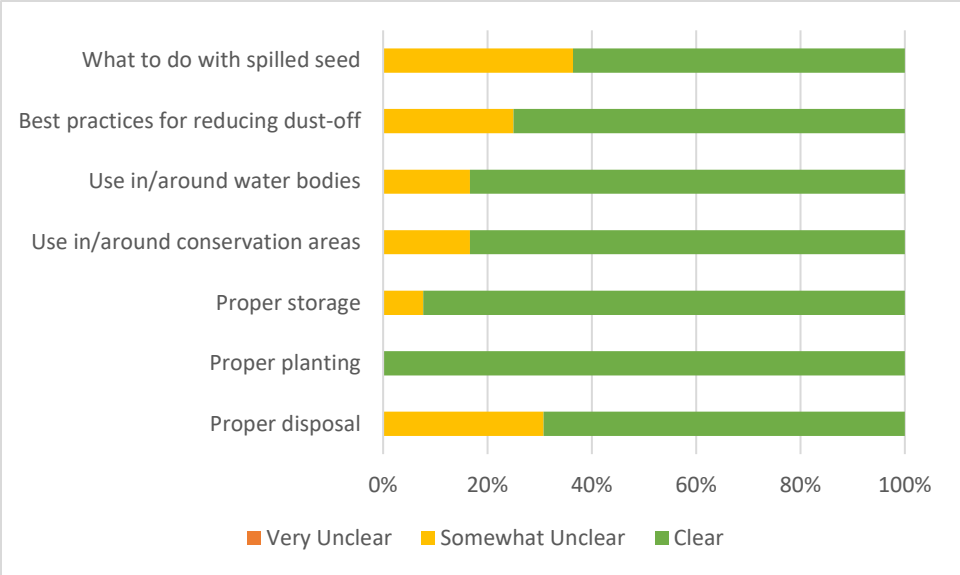

Fig. 2. How clear survey respondents felt treated seed labels are on specific aspects.

Overall, the survey revealed substantial support for the continued use of treated seed. Not a single respondent marked that they felt they had effective alternatives to treated seed, while all participants (100%) marked that they believe the use of treated seed increases yield (Fig. 3). One respondent commented, *"[Treated seeds] are critical to managing insects in crop establishment. In many situations the only remedy for emergence problems is to replant if crop fails due to lack of treatment on seeds*."

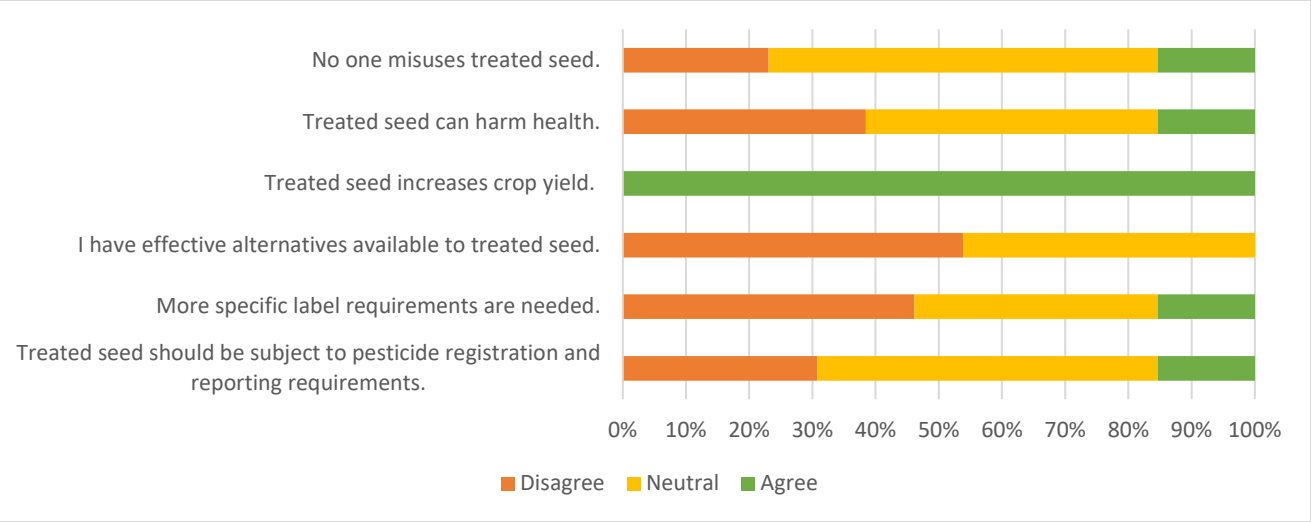

Fig. 3. To what degree survey respondents agree with statements about treated seed regulations and usage.

It is clear that stakeholders are reliant on treated seeds and have no substantial concerns about the misuse of it in agriculture. Though, minor label clarification may be necessary to ensure proper disposal of spilled and excess seed. We request that the EPA consider these points when considering the potential future regulation of treated seeds. In addition, further research into alternatives to treated seed is needed to support our local stakeholders so that they can comply with ESA standards and also able to protect their crops and livelihoods.

Thank you for your attention to this matter.

Sincerely,

Marion Murray
IPM Specialist
marion.murray@usu.edu