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## Benefits of Neonicotinoid Seed Treatments to Soybean Production

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**Docket ID:** EPA-HQ-OPP-2014-0737

**Agency:** Environmental Protection Agency

### Summary:

Public docket for the Agency's assessment of benefits of neonicotinoid seed treatments to soybean production

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Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- BAN NEONICOTINOID's NOW. Killing the honey bee's will have long lasting detrimental effects to our food chain and natural habitats.
- Public Submission
- Posted:

11/14/2014

- ID:

EPA-HQ-OPP-2014-0737-0066

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As a beekeeper that has lost all from neonicotinoids please ban this pesticide. 300 bee hives all dead form pesticides
- Public Submission
- Posted:

11/14/2014

- ID:

EPA-HQ-OPP-2014-0737-0065

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I am a Beekeeper in SW Minnesota that used to maintain 300 bee hives. I lost all but 2 due to pesticide poisoning. How do I know? well this area is surrounded completely by corn...

- Public Submission
- Posted:

11/14/2014

- ID:

EPA-HQ-OPP-2014-0737-0064

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As a grower of soybeans and also an Agronomists that advises farmers, the Neonicotinoid products are very important to growing healthy, high yielding soybeans. In areas of the...
- Public Submission
- Posted:

11/14/2014

- ID:

EPA-HQ-OPP-2014-0737-0063

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by Gus Lorenz, Lonoke County Cooperative Extension Service](#)



- See attached file(s)
- Public Submission
- Posted:

11/07/2014

- ID:

EPA-HQ-OPP-2014-0737-0062

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Soybean seed treatment with neonicotinoid chemistry has shown benefits not only on soybeans but on reducing the population of insect pest which affect other crops such as corn and...
- Public Submission
- Posted:

11/07/2014

- ID:

EPA-HQ-OPP-2014-0737-0061

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I support the right for farmers to use any and all effective tools to create higher yeilds on their farm.
- Public Submission
- Posted:

11/07/2014

- ID:

EPA-HQ-OPP-2014-0737-0060

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- The Neonicotinoid treatments give us a advantage in both vegetables and soybeans. we can not afford to lose this tool.
- Public Submission
- Posted:

11/07/2014

- ID:

EPA-HQ-OPP-2014-0737-0059

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As the world population continues to grow, increased production is necessary to feed a hungry population. Significant testing using neonicotinoids has demonstrated a yield response...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0058

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I support the farmers rights to use this effective tool to create higher yields on their own farms. This should be the personal choice of the farmer if they want to use it or not...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0057

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I have viewed and weighed many soybean plots over my 43 years in the retail business .I am a certified crop advisor and have been recognized by no till farmer magazine as an award...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0056

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- If we are going to continue to feed the world we need to protect our crops from harmful insects. Seed treatments are the safest way to do that.
- Public Submission

- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0055

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Growers continue to be tasked with feeding an ever growing world population. I implore the EPA to review ALL the facts as they review the use of these beneficial and important...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0054

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public commeney](#)

- I have seen from personal experience the value of neonic's controlling seed corn magots that were attacking young germinating soybean seeds in the seed furrow in a wet soggy field...
- Public Submission
- Posted:

11/06/2014



- ID:

EPA-HQ-OPP-2014-0737-0053

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid Seed Treatments have and continue to provide on average 3-5 bu increase in yield vs non treated soybeans. In the Southern US we have always seen a positive response...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0052

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Farmers need the option of the Neonicotinoid seed treatment. Please don't allow the politically correct crowd sway your decisions. This is a key piece of a farmers ability to...
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0051

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by Mark Biel, Executive Director, Chemical Industry Council of Illinois](#)



- See attached file(s)
- Public Submission
- Posted:

11/06/2014

- ID:

EPA-HQ-OPP-2014-0737-0050

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Please allow growers to use these valuable tools to manage their crops.
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0049

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by J. Haffner](#)

- Our soybean yields will be down by 1/3 without this technology. We really need it!! Jerry Haffner
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0048

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I am the sales manager for a agricultural coop in Wisconsin. Cruiser seed treatment, which is a neonicotinoid is an important part of our soybean portfolio because of our earlier...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0047

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid seed treatments are a very important tool for the average farm family. They are an inexpensive and safe way to protect the ever increasing investment in seed that...
- Public Submission

- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0046

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- NeoNics are vital to the production of high yielding soybeans. Without this chemistry, we will struggle to struggle to keep our yields up where they are today.
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0045

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- The use of Neonicotinoid seed treatments are a very important tool for the ag industry. Being in the industry I have seen first hand the benefits they bring to growers. It would be...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0044

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)



- Seed treatments are an environmentally safe and efficient method of protecting a crop from the start at planting. The old adage of "start clean, stay clean" can be realized in crop...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0043

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I recommend stopping the use of neonicotinoid pesticides. These insecticides are harmful to pollinators. Pollinators are necessary for the long term success of our agricultural...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0042

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I am a retailer and soybean grower. The value of Neonicotinoid seed treatments are great. They not only help with keeping in the soil insects in check but gives us 3 weeks of...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0041

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Please review additional research regarding neonicotinoids. We have seen definite benefits to the use of this product as a seed treatment and in crop for specific insect control.
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0040

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoids are crucial and need to stay on the market. Removing would be detrimental and result in a very negative economic impact, especially with Corn and Orange growers...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0039

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Please recheck your data set, it needs to be more complete. In the past decade, we went from spraying for aphids for the first time, to controlling them almost exclusively via...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0038

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Insecticide seed trts can be a valuable tool in preventing early crop damage due to sucking and chewing insects. In many cases I have seen where a seed trt was not needed, however...
- Public Submission

- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0037

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As a lifelong farmer, I have always strived to be a good steward of the land. Why would we want to harm anything that affects our livelihood? As farmers, we go out of our way to...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0036

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Soybean seed treatments are an important part of producing the healthiest and best possible soybean crop. With out this tool a significant amount of resources and other chemicals...
- Public Submission
- Posted:

11/05/2014

- ID:



EPA-HQ-OPP-2014-0737-0035

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by W. Beutke](#)

- All, Please review additional information on the benefits of seed treatments used in soybeans. Your current report used a limited data set, was incomplete, and undervalued the...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0034

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- The EPA report "Benefits of Neonicotinoid Seed Treatments to Soybean Production" published recently is an incomplete assessment filled with half-truths in an obvious preliminary...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0033

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- this is a great product to help us on insects in the soil please don't take it away
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0032

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- It is proven that neonics increase food production for our growing population. In order to keep the pace and feed all of the countries of the world we must use the technology that...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0031

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- To: US EPA From: Mark Testerman, Concerned Citizen and user of Neonicotinoid Seed Treatments 1. The EPA based its preliminary conclusions on 26 efficacy studies from university...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0030

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by P. Langer](#)

- Being a soybean grower I value the seed protection we get from the neonicotinoid treatments in our heavy ground. Secondary pests can destroy my stands early leaving me with little...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0029

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid seed treatments allow me to grow more and better corn and soybeans on my farm to help feed the people of our world. It allows my to keep more plants alive by...
- Public Submission

- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0028

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by M. Plitt](#)

- Dear Agency, An independent study using sound science and true facts about agricultural production have found the following benefits: Preliminary data from a yield meta-analysis...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0027

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Treatment of seeds using agricultural chemicals remain a highly cost effective way of protecting the growers' investment and ensuring an affordable food supply while safe guarding...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0026

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by B. Hackbarth](#)

- I am asking you (EPA) to highly consider allowing neonicotinoid seed treatments on soybeans. I am an agronomist and this will help out farmers throughout the country grow better...
- Public Submission
- Posted:

11/05/2014

- ID:

EPA-HQ-OPP-2014-0737-0025

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid insecticides are an important means of controlling soil-borne insects as there are not any foliar insecticides that will control these insects. Neonicotinoid...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0024

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- On my farm I have seen great benefits from the use of neonicotinoid seed treatments. The very first year that we used thiamothoxin on our soybean seed treatment there was an...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0023

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by D. Ebert](#)

- As an agronomist in the industry for 23 years I have recognized that these seed treatments are critical for achieving higher yields. Farmers need this tool for profitability and...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0022

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by D. Koops](#)

- This comment is in support of keeping neonicotinoid insecticides available, especially as seed treatment or in soil treatment for various insects. As an agronomists with more than...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0021

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As a seed compay we have tested the use of seed treatment in our region (north central corn belt) and find that nearly every year in the vast magority of times in our tests as...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0020

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid seed treatments are an important tool in managing soil borne insect pest like wireworms, grubs, and seed maggots. Without using neonicotinoid seed treatments farmers...
- Public Submission

- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0019

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I am writing to put my support behind the Neonicotinoid seed treatments. My company has been using the Cruiser line of products for several years and our growers have benefited...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0018

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Growers find benefits in a number of different ways that needs to be incorporated in estimates of value of any plant protection product. Neonicotinoid seed treatments provide...
- Public Submission
- Posted:

10/31/2014

- ID:



EPA-HQ-OPP-2014-0737-0017

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Finally documents to bring reality to a situation that was already confirmed. Losing good tools for agriculture production would be a mistake!
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0016

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by B. Johnston](#)

- Please review new information on the benefits of seed treatments used in soybeans. The current EPA report used a limited data set, was incomplete, and undervalued the benefits that...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0015

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I support soybean growers and their right to use effective tools.
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0014

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- As a farmer in West Central MN I have seen the use of Neonicotinoids seed treatments greatly increase the stand and quality of my soybean crop. The use of a good seed treatment...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0013

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I fully support the use of neonicotinoid seed treatments in soybean production. Compared to other insecticides, neonicotinoids are some of the safest chemistries for humans to...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0012

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Please do not take neonics off the market. Our significant investment in time management during the planting season will be greatly impacted if we can not protect the seed with...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0011

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- I am retired after a lifelong career in the agricultural production community and am well-versed with the tools used in this sector. Please revisit the data used in registering...

- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0010

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Neonicotinoid insecticides are one of the safest insecticides that farmers in my area use and they are an effective tool used to control many sucking pests such as Aphids, Flea...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0009

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Using neonic products on my soybean crop is extremely valuable and elimination of neonics would force producers like myself to utilize other foliar insecticides at no net benefit...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0008

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- Farmers need these types of products to be able to get the yield necessary out of the existing farm land to feed the nation and worlds growing population Foliar sprays are...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0007

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- The EPA report "Benefits of Neonicotinoid Seed Treatments to Soybean Production" published recently is an incomplete assessment that does not fully represent the important benefits...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0006

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Anonymous public comment](#)

- THERE ARE NO BENEFITS TO AMERICA FROM ALLOWING THIS TOXICITY TO BE FOISTED UPON OUR LAND. NO BENEFITS AT ALL. WE DONT NEED 20,000 TOXIC CHEMICALS APPROVED FOR USE ON PLANTS. SUCH...
- Public Submission
- Posted:

10/31/2014

- ID:

EPA-HQ-OPP-2014-0737-0005

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by S. Stewart, Professor and Extension Entomologist, IPM Coordinator , The University of Tennessee, Entomology & Plant Pathology](#)



- Please see my uploaded comment
- Public Submission
- Posted:

10/29/2014

- ID:

EPA-HQ-OPP-2014-0737-0004

Comment Period Closed

Dec 22, 2014 11:59 PM ET

[Comment submitted by M. Frazier](#)

- The use of neonicitoids is clearly associated with high rates of death among bee populations. Bees pollinate our food source. Approving any use whatsoever is out of line with...
- Public Submission
- Posted:

10/29/2014

- ID:

EPA-HQ-OPP-2014-0737-0003

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