



PO Box 1623
Bloomington, IL 61702-1623
PH: 309-557-3257

www.ilcorn.org

August 28, 2020

U.S. Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

Re: Docket ID: EPA-HQ-OPP-2020-0306, in support of the neonicotinoid pesticides acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam

To Whom it May Concern:

Illinois Corn Growers Association appreciates the opportunity to provide comments **supporting** the registration of neonicotinoid insecticides. We represent more than 4,000 corn farmer members throughout Illinois who all rely on the latest and most up-to-date technology to sustainably manage the roughly 27 million acres of farmland, covering about 75% of our state. These farmers need every available tool to manage insect infestations and grow enough grain to feed and fuel our world.

Over the past decade, the U.S. Environmental Protection Agency (EPA) has conducted an extensive registration review for neonicotinoids. ICGA was pleased to contribute comments in that process, adding to what must have been thousands of pages of materials supporting the efficacy and safety of neonicotinoids when used according to label.

The Natural Resources Defense Council's petition that EPA revoke all tolerances for the neonics ignores this thorough review. Supporting the petition would undermine established Federal Insecticide, Fungicide, and Rodenticide Act processes and EPA's scientific authority.

In addition, revoking registration for these tools would drastically impact corn production and Illinois agriculture. AgInformatics analyzed the impact to U.S. agriculture if neonicotinoids were no longer available to U.S. farmers in 2015. They found that costs to farmers would increase \$848 million annually while yields declined. This impact would magnify, touching every part of the food supply chain.

Our members are invested in safe, effective pest control. Without access to this class of pesticides, farmers could be forced to rely on higher quantities of less effective products. Illinois corn farmers do not want to see that happen.

Although eliminating neonicotinoid use will not solve the decline in monarch and other pollinator populations, Illinois corn farmers have worked closely with the IL Monarch Project to accomplish a milkweed stem goal of 150 million stems by 2038. Increasing pollinator habitat

and utilizing more rural acres for habitat will put us on the right path to help them rebound. This is yet another way that Illinois corn farmers have proven themselves invested in the environment and committed to sustainable management of the acres in their care.

Thank you for the opportunity to comment in support of neonicotinoid pesticides, against the NRDC's petition, and in support of the EPA's commitment to thorough, scientific review.

Sincerely,

A handwritten signature in blue ink that reads "William L. Leigh". The signature is fluid and cursive, with a large loop at the end of the last name.

William L. Leigh
President