



September 15, 2021

To: The Honorable Steve Englebright,
Chair of the New York Assembly Committee on Environmental Conservation
Re: New York Assembly Standing Committee on Environmental Conservation
Public Hearing - September 20, 2021

The American Seed Trade Association (ASTA) is writing this letter to submit comment for the public hearing called to examine the impact of neonicotinoid pesticides on pollinators and the environment.

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 AgInforomatics, without seed treatment technology U.S. cropped land would need

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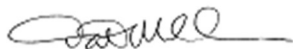
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to increase between 340,000 and 410,000 acres to offset losses in yield and quality, much of which would come from the Conservation Reserve Program, environmentally sensitive land established to preserve water, soil and wildlife.

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 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.

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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American Seed Trade Association
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