



ASTA Seed Treatment and Environment Committee

**Update on Treated Seed Labeling
Crop Life America Seed Bag/Tag Sub-team**

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Treated Seed Labeling

- Federal Seed Act Requires:
 - This seed has been treated with **XXX (name of active ingredients)**.
 - Do not use treated seed for feed, food or oil purposes.
- Seed Treatment Pesticide Labels Often Contain:
 - “In addition, the U.S. Environmental Protection Agency requires the following statements on the container of corn seed treated with...”



Challenges Identified by CLA Seed Bag/Tag Sub-Team

- EPA-driven requirements
 - Are increasing
 - Wording of statements is inconsistent with similar statements on other products
 - Some requirements are targeted to seed treatment applicators, and the seed bag/tag is not the right way to convey this information
- Seed companies
 - Have to include the required language from multiple products to cover all products that might appear on the seed
 - Often pre-print the packaging 18 months ahead of seed sales
 - Have to manage changes to required language, resulting in obsolete materials (increased costs) each year



Proposal

- Identified a list of standard statements to retain on the seed tag:
 - Grouped similar statements and proposed a single statement for each group
 - Includes FSA, Stewardship and State Requirements
- Proposed removal of statements that are not targeted to growers and/or not best communicated through the seed tag
- Acknowledged that some products will continue to require compound specific statements
 - Recommended a process be added by which new statements are vetted across review teams and common language agreed upon for any such similar statements



Discussion with EPA

- Met with Jeff Hearndon, EPA, and several others from EPA Registration Division, USDA, and SLA
 - October 21, 2013
 - March 26, 2014
 - April 16, 2014
- Reached agreement on the standard language to harmonize and several statements to delete (content covered elsewhere)
- Agreed to propose a class of compounds to
 - Address first for implementation
 - Use as a case-study for working through updates to relevant compound-specific statements
- Follow-up meeting scheduled for 6/19/14 **Postponed at least 1 month**



Project Challenge

- Became aware the week of June 2 that Center for Food Safety (CFS) sent a letter to EPA and USDA on April 23, 2014 titled:
Re: URGENT - new label language for bags/tags for neonicotinoid treated seeds
- Highlights of letter:
 - Obtained meeting minutes from October 2013 meeting between CLA workgroup, USDA, EPA, SLAs (FOIA)
 - CFS inferred from the meeting notes that Directions for Use regarding pollinators, dust and neonic treated seed is insufficient
 - Alleges that EPA is not consulting other agencies as required by the Endangered Species Act during registration review
 - Alleges that specific environmental statements are missing from treated seed labeling (do not appear in meeting minutes specifically)
 - Challenge that treated seeds are not exempt from enforcement under FIFRA and EPA should be regulating



A Few Points to Consider

- CFS letter is specific to neonic precautions, however the seed bag/tag project is wholistic
- The purpose of the project and the minutes of the meeting were largely taken out of context
 - Purpose was not suggest “content” changes to labeling messages, but more for harmonization of the “wording” used from product to product
- Environmental statements that were assumed missing by CFS, were captured in a bullet point described as compound-specific language. There is no intent from the teams to eliminate these messages, they were not covered because they are product-specific and were not targeted for harmonization of wording.



Next Steps

- EPA asked to postpone the 6/19/14 meeting so they can send a formal response to CFS (expected to take ~1 month)
- Crop Life America will consult across teams on next steps
 - Pollinator Issues Management Team (PIMT)
 - Law
 - Communications
- Develop strategy for communications, if any, with EPA and/or USDA. Most likely following EPA's formal response to CFS.
- Resume project once the EPA has responded



Next Steps within the Project

- CLA members compiled a list of seed treatment products they use
- Sub-team will evaluate the list by class and determine the first group to address with EPA
- Meet with EPA to evaluate the changes needed in the first class and develop implementation plan and timing

