



NATIONAL POTATO COUNCIL

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August 23, 2012

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 28221T
Washington, D.C. 20460-0001

Submitted electronically via <http://www.regulations.gov>

RE: *Clothianidin; Emergency Petition to Suspend; Notice of Availability* – Docket No.
EPA-HQ-OPP-2012-0344

The following comments are in response to the request by the U.S. Environmental Protection Agency's (EPA) for public input in the Federal Register of July 27, 2012. On behalf of the National Potato Council (NPC) and U.S. potato growers, thank you for your consideration of these comments.

The NPC is the only national public policy advocacy organization for the U.S. potato industry and represents more than 90 percent of the commercial potato growers in the United States. Thirty-two states are home to commercial potato production. Potato growers, along with the rest of the potato industry, are committed to providing the highest quality, nutrient-dense, and most affordable potatoes to consumers at home and around the world.

We applaud EPA for following existing registration review procedure for clothianidin (docket EPA-HQ-OPP-2011-0865) to evaluate any possible impacts of this product on non-target species. We believe the Agency's decision to deny the request to immediately suspend the product's registration was justified by the available data and was appropriate while the review process is underway. It is vital that the established, science-based procedure for the regulation and approval of existing crop protection tools is followed to give our nation's potato growers the stability they need for pest management while balancing any health and environmental risks that may exist.

Clothianidin is an essential pest management tool for potato farmers. This product provides effective control of beetles, aphids, leafhoppers and other pests. It is also important to Integrated Pest Management (IPM) practices used by potato farmers since it does not adversely affect beneficial insects. In the potato industry clothianidin is used as a part of an overall pest management plan that includes scouting and applications based on minimizing rates and adherence to clearly identified economic thresholds. IPM is an effective way to manage a variety

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of different pests with minimal environmental and economic impact, while protecting and preventing crop losses and improving the bottom line of our nation's potato farmers. Without clothianidin, the responsible approach and practices of an IPM strategy would be needlessly undermined.

In conclusion, a science-based approach toward clothianidin and other neonicotinoid insecticides is essential to a credible review process that allows for effective pest management and appropriate protections for workers, the environment and the public. Throughout the ongoing registration review and into the future, we encourage EPA to continue its development of best management practices and labeling as a way to minimize any adverse impact on the environment, including pollinators.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "John Keeling". The signature is written in a cursive, flowing style.

John Keeling

Executive Vice President and CEO
National Potato Council