



Neonicotinoid Treated Seeds

**Agriculturally wise?
Or environmental demise?**

California FFA State Finals 5/7/22

**GRIDLEY
FFA**

Kennison Cota

Becca Hamman

Miranda Johnson

Alyssa Thompson

Avery Weagant

Gridley FFA • Neonicotinoid Treated Seeds

1. List course(s) in which instruction occurred including the number of students involved.

Instruction related to this issue occurred in the following courses taught within the Gridley High School Agriculture Department: Intro to Agriscience (Ag Chemistry), the 36 students conducted research on the Neonicotinoid insecticide class and the most commonly available pesticides falling into the classification. Intermediate Agriscience (Ag Biology), the 41 students evaluated the studies conducted on potential biological and ecological impacts Neonics may impose. Greenhouse Management & Production, 30 students examined seed coat treatments as an effective method of pest management while also learning how systemic pesticides work to protect the plant from seed sowing through germination. Total: 107 students.

2. Why is the issue important now?

Now more than ever do we as an industry see the need for precision agriculture, as our farmers strive to feed a growing population of 10 billion people by the year 2050 (Population Reference Bureau, 2020). The shift to neonic coated seed usage is one effort that farmers are making to become more precise in their fields and increase the sustainability of their operations (Syngenta, 2022). However, at this time there has been two bills proposed by California State Assembly Member Baur Kahn targeting neonicotinoid use on seeds. The initial bill, with the goal of prohibiting the planting of seeds treated with neonics in California failed in January, leading her to introduce a second, less stringent bill (A.B. 567, 2021)(A.B. 2146, 2022). While this second bill only aims to eliminate the non agricultural use of neonicotinoids, it still has the potential to bear lasting implications on farmers using neonics and the accessibility of the pesticide in the agriculture industry.

3. What is the nature of the issue?

Farmers across America have taken a step to improve efficiency on their operations, by coating seeds with neonicotinoid pesticides. However, these growers are also facing regulations and the potential banning of neonicotinoids because of the threats they may impose to pollinator populations, as well as potential pollution to groundwater. November's DPR hearing regarding seed treatments revealed the lack of extensive research that is available to seed coat treatments and their possible impacts. Circumstances such as these leave this conflict as a matter of efforts to either prevent over-regulation of what could potentially be the most advantageous alternative to dangerous pesticides, or place constraints around technology that has unknown implications on the safety of our environment and human health.

4. Who is involved in the issue?

Regulators of the issue include the California Department of Pesticide Regulation (DPR), and the Environmental Protection Agency (EPA), as they are tasked with managing the usage of pesticides in the United States, and enforcing the California Food and Agriculture Code (FAC), as well as the Federal Insecticide and Rodenticide Act (FIFRA). Stakeholders include environmental groups, such as the Natural Resources Defense Council (NRDC), as well as agricultural organizations, such as the California Seed Association (CSA), and the California State Beekeepers Association. Those conducting further research on the matter, such as the UC Cooperative Extension, also play an important role in determining the future of neonic coated seeds.

5. How can the issue be defined?

This issue is a continuing altercation, clearly divided between the parties involved, surrounding the significant regulatory loophole. Under the EPA's Federal Insecticide and Rodenticide Act, neonicotinoid treated seeds are exempt from registration, because they are classified as "treated articles", which is defined by the Treated Article Exemption as an article treated with, or containing a pesticide to protect the article itself. Without falling under the DPR's state definition of a pesticide application, a loophole was created for farmers planting neonic coated seeds in their fields without a requirement for pesticide use registration and extensive regulation (Teerlink et al., 2021). Stakeholders fighting for further regulations surrounding neonics, that are against farmers' ability to use neonics as liberally as they are now, are working to close said loophole (Raichel, 2021). The agriculture sector on the other hand, recognizes the validity of the loophole as a necessary omission due to reduced pesticide usage leading to reduced impacts on the environment and improved workforce safety (AgInforomatics, 2014).

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6. What is the historical background of the issue?

Seed coating as a method of crop production was first introduced in 1930, where producers began dipping seeds, or coating them with thin and permeable layer of pesticide solution, before planting (Ehsanfar & Modarres-Sanavy, 2005). Neonicotinoids, which are a class of synthetic pesticides, widely began usage in the late 1980s and early 1990s, where their adoption into the industry took off, rapidly becoming the most widely used insecticide in the world (Holt, 2020). In the early 2000's, attention was drawn to the effects that the dust from treated seeds could impose on pollinators. In 2008, dust released from treated corn seeds resulted in damage to nearby honeybee colonies in Germany, triggering seed companies to publish risk management approaches and take a closer look into the safety of neonics. In 2012, Science Magazine released a statement claiming that neonic use had a direct link to adverse effects on pollinator health. The European Union banned all use of four neonicotinoids in 2018 (Bayer, 2021). In the United States, Maryland became the first state to ban consumer use of neonics in 2016, followed by similar regulations from the states of Maine, New Jersey, and Connecticut. As of August 29, 2022, the second bill which following the fail of the initial bill to ban neonic treated seeds, has passed in the California Assembly and Senate to eliminate the non-agricultural use of neonics in California (A.B. 567, 2021)(A.B. 2146, 2022).

7. What caused the issue?

The 2008 incident of harm to the German honeybee colonies due to the release of excess dust from neonic treated corn seeds signified a turning point in how those in the industry had previously perceived the safety of neonicotinoids (Bayer, 2021). This event triggered global attention to the popularity of neonics and the unknown effects that they may warrant. After shining light on the potential negative outcomes of what's believed to be a new and effective method of precision agriculture, concerns worldwide arose to consider the regulation of seeds coated with neonics. Recent legislative efforts to ban these seeds in California, have brought this issue to the forefront of California's DPR, where the matter currently stands as a squabble between stakeholders such as agriculture seed companies, industry members, and conservationist groups.

8. What are the risks?

Opposition to widespread use of neonics surrounds concerns for pollinator and environmental health, due to the lack of knowledge in regards to long-term impacts of coated seeds. A fate analysis conducted in the Midwest and reported on by the DPR in a public hearing found that only 2-3% of the neonics actually get taken up by the plants, where 90% go into water soils and non crop plants, and 2-3% get carried away by dust. This indicates that the remaining estimated 97% of pesticide is up for potential contamination or exposure to natural resources (Krupke & Tooker, 2020). These impacts may presents prolonging health risks to native pollinators and potential for Colony Collapse Disorder (CCD).

9. What are the benefits?

According to the AgInfomatics, neonic treated seeds as a form of pest management offer benefits such as increasing crop yield, lowering insecticide use, enhancing quality of crop, and reducing operating costs. With the use of neonics in U.S. corn and soybean fields, growers were able to estimate that neonicotinoids' value was \$12 to \$13 an acre on average, while the total value of neonics in annual crop production nationwide ranges from \$4-4.3 billion. The centralization of the pesticide that neonic treated seeds provide is able to reduce impact to off-target organisms, such as pollinators (AgInfomatics, 2014).

10. Is there strong disagreement on how the issue should be solved?

In the eyes of environmental representatives such as the Natural Resources Defense Council (NRDC), the risks associated with providing reduced regulation to treated seeds is not worth the potential negative impact to the ecosystem. This leaves conservationists presenting the complete ban of neonics, by classifying them as restricted material, as the only option (NRDC, 2022). Stakeholders on behalf of the agriculture industry are frustrated that even after developing and employing the most sustainable and precise method of pesticide application, for not only their employees and the integrity of their operation, but the environment, they're once again met with faulty ridicule from conservationists whose goal is to push legislation (Seed and Agricultural Industry Coalition, 2022). From the standpoint of the regulator, DPR, further research needs to be done on California soil, specific to the coated seeds and the commodities that they're used on, before they can make an accurate assessment to regulate further restriction if impacts are proven (Teerlink et al., 2021).

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Documented Forums

Organization	Presentation Date & Time	Location	# Present
Elk Grove Alumni & Supporters	4/2/22 @ 11AM	Elk Grove, CA	5
California State Beekeepers Association	4/4/22 @ 10AM	Sacramento, CA	8
Alpine Pacific Nut Co.	4/8/22 @ 1:30PM	Hughson, CA	4
California Seed Association	4/20/22 @ 10:30AM	Sacramento, CA	9
Butte County Farm Bureau Staff	4/21/22 @ 1PM	Richvale, CA	3
California Agricultural Commissioners & Sealers Association Executive Committee	4/25/22 @ 10AM	Sacramento, CA	6
Pesticide Applicators Professional Association	4/25/22 @ 2PM	Sacramento, CA	5
Butte County Farm Bureau Board of Directors	5/5/22 @ 7:30PM	Richvale, CA	17

Elk Grove FFA Alumni & Supporters

April 2nd, 2022
11:00 AM

Elk Grove High School - Elk Grove, CA

Number in Attendance: 5

Contact Person: Amy Erman
209-484-4409



ELK GROVE FFA
ALUMNI AND SUPPORTERS

ELK GROVE HIGH SCHOOL
9800 ELK GROVE-FLORIN RD
ELK GROVE, CA 95624

4/2/2022

Gridley High School FFA
Agriculture Issues Team
Attn. Ms. Madison Albaini
300 E. Spruce St.
Gridley, CA 95948

Dear Ms. Albaini and Ag Issues Team Members,

The Gridley High School FFA Chapter Ag Issues Team coached by one of our very own Elk Grove FFA alumni presented their agricultural issues forum to members of the Elk Grove FFA Alumni and Supporters on Saturday, April 2nd in Elk Grove, California. The team presented their mock forum on the issue of neonicotinoid treated seeds and illustrated the many perspectives on the topic with professionalism and knowledge.

Our members were previously unaware of this budding issue the seed industry and agriculture is facing and found the presentation and nature of the issue very timely and interesting. After the presentation our supporters who are familiar with the Agricultural Issues Forum contest here in California provided feedback on potential approaches to the presentation of the differing sides to the neonic issue.

We look forward to hearing how their presentation evolves as they prepare for state finals and wish them luck in May!

Sincerely,

Amy Erman



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California State Beekeepers Association

April 4th, 2022
10:00 AM

Association Office - Sacramento, CA

Number in Attendance: 8

Contact Person: Brooke Palmer
Associate Director
916-441-0302



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Pleasant Hill, CA
Jackie Park-Burris
Palo Cedro, CA

April 4, 2022

Gridley FFA
Gridley High School
300 E Spruce Street
Gridley, CA 95948

Re: FFA Ag Issues Presentation

Dear members of the Gridley FFA Ag Issues Team,

The California State Beekeepers Association (CSBA) staff was delighted to host you in our office for your presentation on Neonics. We were very impressed to see such a great group of young people tackling important agriculture issues.

In your presentation, one of the positions is that of a beekeeper, and we were pleased to see that you represented our industry in a respectful and educated manner. If there is anything that CSBA can do to help you further develop your knowledge, please do not hesitate to reach out.

We wish you the best of luck in your upcoming contest.

Sincerely,

Brooke Palmer
Associate Director

The first major forum conducted was with the California State Beekeepers Association (CSBA), a group comprised of beekeepers from across California. The group is one of the stakeholders in the neonicotinoid seed treatment issue. As pollinators play an important role in many of California's commodities the potential impacts to colony health and collaborations with farmers and researchers to assess these impacts is crucial. This opportunity allowed the team to ensure our representation of the beekeeper and CSBA were accurately represented.

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California Seed Association (CSA)

April 20th, 2022
10:30 AM

Association Office - Sacramento, CA

Number in Attendance: 9

Contact Person: Chris Zanobini
Executive Vice-President
916-441-2251



California Seed Association

April 20, 2022

Gridley FFA Ag Issues Team
Attn: Ms. Madison Albiani
Gridley High School FFA
300 E. Spruce St.
Gridley, CA 95948

Re: Agricultural Issues Forum Presentation

Dear Ms. Albiani and Gridley FFA Team Members,

On behalf of the California Seed Association (CSA), I would like to thank you for coming to our office to present your Ag Issues Forum on Neonicotinoid Treated Seeds. As you know, this is an extremely important topic right now in our industry, and I commend you on being able to present multiple sides of this complex issue.

The presentation itself was conducted in a very professional manner, and the breadth of materials and research you referenced clearly illustrates your understanding of the many differing perspectives regarding neonic treated seeds. Several of our staff members present were not familiar with FFA contests. They were incredibly impressed with the quality of the team presentation overall, including public speaking skills, poise, professionalism, and knowledge of the topic.

Additionally, I hope that our detailed conversation after the presentation was helpful to the whole team in developing more understanding of the history and process behind treated seeds, as well as the position of CSA on this topic.

Good luck in your upcoming State Contest.

Best,

Chris Zanobini
Executive Vice-President

The California Seed Association (CSA) membership consists of seed firms which believe that the best way to achieve common goals and respond to the problems that affect the seed industry is through cooperative effort and group action. This group is represented in the presentation of this issue as a stakeholder. Executive Vice-President Chris Zanobini gave the group and overview of the issue from the perspective of the CSA and also provided additional industry member for the Seed Association representative contact with specific questions.

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Alpine Pacific Nut Company

April 8th, 2022 at 1:30 PM
Company Office - Hughson, CA
Number in Attendance: 4
Contact Person: Dalton Taylor
Quality Assurance Manager
209-585-5662



Worldwide Marketer of
California's Finest Walnuts

April 8th, 2022

Gridley FFA Ag Issues Team
Attn: Madison Albiani
Gridley High School FFA
300 E. Spruce St.
Gridley, CA 95948

To the members of the Gridley FFA Ag Issues Team and their advisor -

We want to thank you for your presentation you gave to members of the Alpine Pacific Nut Company team. Your presentation on the issue surrounding Neonicotinoid treated seeds was provided in a professional manner and demonstrated a strong understanding of the multiple perspectives on the issue.

As agriculture continues to work to implement new practices that improve not only our yields but do so in an environmentally conscious manner this issue represents the constant battle of regulation and attempts to limit a precision agriculture practice. You clearly showed an understanding of the many stakeholders involved in this timely issue.

We at Alpine Pacific Nut Company wish your Gridley FFA Ag Issues Team luck as you prepare and compete at the state competition.

Sincerely,

Dalton Taylor
Quality Assurance Manager

6413 E. KEYS RD. • PO BOX 999, HUGHSON, CA 95326
P: 209.667.8688 • F: 209.667.8676 • ALPINEPACIFICNUT.COM



April 28, 2022

Gridley FFA Ag Issues Team
Attn: Madison Albiani
Gridley High School FFA
300 E Spruce St
Gridley, CA 95948

Dear Gridley FFA Ag Issues Team and advisor,

Butte County Farm Bureau would like to thank you for presenting your Ag Issue presentation to the BCFB staff on April 21st. We appreciated your professionalism and knowledge regarding your topic on neonicotinoid coated seeds.

Your topic is very controversial but essential to the future of the agriculture industry. We appreciate the time and hard work that your team has dedicated to researching this topic.

Butte County Farm Bureau wishes you the best of luck in your competition!

Sincerely,

Katy Gough
Program Coordinator



Butte County Farm Bureau Staff

April 21th, 2022 at 1:00 PM
Butte Co. Rice Growers Board Room - Richvale, CA
Number in Attendance: 3
Contact Person: Katy Gough
Program Coordinator
530-441-0302

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California Agricultural Commissioners and Sealers Association Executive Committee

April 25th, 2022
10:00 AM

Conference Room - Sacramento, CA

Number in Attendance: 4

Contact Person: Lindsey Liebig
Executive Director
209-712-7120

Following our visits to stakeholder groups and agriculture industry, we presented and visited with the executive committee of the California Agricultural Commissioners and Sealers Association. If legislation on restricted use were to pass and agriculture were to see continued red tape to utilize Neonic products and seed coatings, the county ag commissioner's could potentially be tasked with working closely with the DPR to serve as the primary enforcement agents for State pesticide laws and regulations that may be imposed.

California Agricultural Commissioners and Sealers Association



April 25, 2022

Gridley FFA
Attn: Madison Albani
Gridley High School
Gridley, CA

Dear Members of the Gridley FFA Agricultural Issues Team,

Thank you for your presentation regarding neonicotinoids to our membership. Your presentation was thorough and very timely, as this issue is plaguing the agriculture industry currently in both the regulatory and legislative bodies. This issue is something our Agricultural Commissioners face regularly as they enforce the various laws and regulations from the Department of Pesticide Regulation and work with local growers to both attend to their crop production and protect our apiary species.

We appreciate your presentation and raising awareness of the various issues surrounding these products and look forward to continuing to provide you with information regarding this developing issues. Learning about real world topics like these that affect our growers is imperative in agriculture education and we are proud to support your efforts.

Please let me know if you or your team need anything additional for this presentation or any other aspect of your program and our association would be more than happy to help with your local chapter.

Thank you,

A handwritten signature in black ink, appearing to read "Lindsey Liebig".

Lindsey Liebig
Executive Director

Gridley FFA • Neonicotinoid Treated Seeds



April 26, 2022

Gridley FFA Ag Issues Team
Attn: Ms. Madison Albani
Gridley High School FFA
300 E. Spruce St.
Gridley, CA 95948

To the Gridley FFA Ag Issues Team and Coach Albani:

Thank you for presenting your recent Ag Issues Forum on Neonicotinoid Treated Seeds to Pesticide Applicators Professional Association (PAPA) on Monday, April 25th, 2022. The PAPA staff was very impressed with your knowledge on the difficult subject matter, and ability to present multiple points of view. At PAPA, this is an important topic with the potential of creating many long-term changes within our industry.

Congratulations to the team on your impressive preparation efforts, and best of luck in your upcoming competition!

Sincerely,

Maryana Schmidt
Pesticide Applicators Professional Association
Program Director

Pesticide Applicators Professional Association

April 25th, 2022 at 2:00 PM

Association Office - Sacramento, CA

Number in Attendance:

Contact Person: Maryana Schmidt
Program Director
831-442-3536



May 5, 2022

Gridley FFA Agriculture Issues Team
Attn. Ms. Madison Albaini
300 E Spruce St.
Gridley, CA 95948

Dear Gridley Ag Issues Team Members & Advisor,

We invited Gridley's Ag Issues Team back to our meeting of the Butte County Farm Bureau Board of Directors to give their presentation to local agriculturists, as well as stakeholders. Controversy surrounding neonic treated seeds is an issue relevant to our particular area making the Gridley FFA teams topic both current and relevant to our board members.

Since the time of the team's initial presentation to our office staff, their knowledge on the issue and representation of the stakeholder positions has grown and feedback received had been incorporated. The board members found the presentation to be spot on with this evolving issue specifically in terms of relationship between the stakeholders each of their viewpoints.

We look forward to following the team and wish them nothing but success at the State FFA Finals contest.

Sincerely,

Coleen Cecil
Butte County Farm Bureau Executive Director

Butte County Farm Bureau Board of Directors

May 5th, 2022 at 7:30 PM

Farm Bureau Board Room - Richvale, CA

Number in Attendance: 17

Contact Person: Colleen Cecil
Executive Director
530-441-0302