

## **Comments from BASF Corporation and Valent U.S.A. LLC on California DPR Seed Treatment Workshop**

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BASF Corporation (BASF) and Valent U.S.A. LLC (Valent) appreciate the opportunity to comment on CDPR's Seed Treatment Workshop that was held in November 2021. Innovation and product stewardship are core values that drive what we do. We provide our customers with quality seed treatment products, including the support and resources they need to overcome agronomic challenges. We are fully committed to integrated pest management (IPM) practices, proper stewardship, and the sustainable use of our products.

Seed treatments are an important cornerstone in sustainable agriculture and integrated pest management (IPM) programs. A seed treatment is a precise, targeted application of pesticide with minimal amounts of active ingredients per individual seed. This application method provides a highly effective, selective technique to protect seeds from insects and diseases during plant stand establishment and early developmental stages. Protection of the seeds allows growers to plant earlier which can both maximize yield as well as optimize planting rates to reduce cost and eliminate the dependence on higher rates of soil and foliar applied insecticides and fungicides.

The U.S. EPA has developed a comprehensive, science-based risk assessment process to evaluate potential risk (probability of harm) of pesticides and to inform the development of pesticide label directions, warnings and restrictions. The process requires the generation of extensive laboratory toxicity and ecotoxicology data as well as environmental fate and transport data for pesticides used in seed treatment. Data from these studies are compared with conservative estimates of exposure based on highest application rates, maximum number of applications and other worst-case factors to evaluate potential risk. No pesticide is registered by EPA for use in seed treatment unless it meets the established risk assessment criteria.

As required by CDPR, products used for treating of seed in California are registered by CDPR. While there may be cases where a seed treatment use has not been specifically assessed by CDPR, the active ingredients used in seed treatments are reviewed and approved in California and most often there are other approved uses for these active ingredients such as foliar or soil treatments. In all cases, products used in seed treatment are extensively reviewed and are approved federally by US EPA, covering conditions throughout the US including California, and maximum residue limits ("tolerances") are established in agricultural commodities to support approved methods of application for a given product and active ingredient.

Seed treatments are a critical component of IPM to reduce non-target exposure and typically result in much less environmental impact. Because of lower application rates and the fact that seeds are planted at depths of 0.5 to 1.5 inches or more below the surface, the potential for runoff or off-site movement is significantly less compared to corresponding direct foliar or soil applications. The precise application of the product on the seed reduces the soil surface exposure vs the potential of a broadcast surface application of a foliar application. Fewer spray applications reduce the potential for pesticide exposure among applicators and non-target organisms such as pollinators and other beneficial insects. It also entails use of less resources, such as fuel, that is required for additional pesticide applications or potential replanting due to a poor crop stand.

A key component for the sustainable use of crop protection products is proper stewardship in the handling, application, and disposal of the products to reduce exposure to the applicators and the environment. Stewardship of seed treatment begins with the proper application technology of the products on the seed to ensure the treatment adheres to the seed. Additional stewardship activities are monitored throughout the lifespan of a treated seed. The crop protection industry is committed to providing our customers with support and educational resources to properly steward our products and is actively engaged in providing support within the agricultural industry to communicate and increase the awareness for stewardship of crop protection products.

Kind Regards,

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