



January 17, 2026

To: Agricultural Innovation Board, Vermont Agency of Agriculture
Re: Draft Rule: "Best Management Practices for the Use of Neonicotinoid Treated Article Seeds and Neonicotinoid Pesticides"

The American Seed Trade Association (ASTA), along with CropLife America (CLA) and Biotechnology Innovation Organization (BIO), is writing this letter to submit comment for the public meeting on January 27, 2025, on the proposed rule, "Best Management Practices for the Use of Neonicotinoid Treated Article Seeds and Neonicotinoid Pesticides" (the "Draft Rule.")

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.

Seed treatment products are highly regulated, as are sprayed and soil-applied pesticides. They undergo thorough evaluation by the U.S. Environmental Protection Agency (EPA), and applicable state agencies, prior to commercialization and periodically thereafter. Only after a seed treatment product is approved by the relevant federal and state agencies, can the product be used in accordance with its EPA-approved label. Labels for commercial seed treatment products carry language that must be placed on the tags of treated seed packages regarding permitted and prohibited practices.

After reviewing the Draft Rule, we want to reiterate our support for safe use of treated seeds and importance of options for farmers in their operations to use treated seeds. The seed industry supports the Vermont Agency of Agriculture's emphasis of education and mitigation for its agricultural sector. Onerous regulations can stifle farmers' ability to produce high-quality crops, while being effective stewards of the environment. It is essential to develop effective and workable practices and appropriately train those who treat, handle, transport and plant the seed to help ensure that seed treatments result in successful crops and a healthy environment. Moreover, mandating restrictions to neonicotinoid treated seeds prior to January 1, 2029, directly contradicts the general assembly's intent and the will of the General Assembly, expressly synchronizing the treated seed portion of the law with New York's law.

In summary, the use of seeds improved through modern technologies, such as seed treatments, is important as a conservation tool and should be considered as an 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,

Jordan Gregory
Director, State Government Affairs
American Seed Trade Association
jgregory@betterseed.org

Dillon Gabbert
Director, State Regulatory Affairs
CropLife America
dgabbert@croplifeamerica.org

Gene Harrington
Senior Director, State
Government Affairs, Agriculture &
Environment
BIO
gharrington@bio.org