



Feb 15, 2022

Jennifer Teerlink
California Department of Pesticide Regulation

Comments: Neonic Coated Seeds - Seeds are plants and pesticides applied to them must be regulated

Dear Ms. Teerlink,

[FACTS](#) is an education and advocacy organization that provides evidence-based information and expert resources on children's environmental health to families and policy makers in an effort to keep children safe from harmful chemicals and toxins.

On behalf of FACTS I urge DPR to take action *which is within your scope of responsibility* and define seeds as plants. Seeds are not articles.

First graders learn that a seed is how a plant begins.

All pesticides applied to seeds must be regulated to protect public health, the environment, our water, our food and our pollinators.

Evidence suggests serious permanent harm to infants and young children from neonic exposure(s) in particular. In 2020, Dr. Gary Hammer, President of the Endocrine Society presented to the U.S. EPA and cited neurological damage, thyroid disruption and malformations of the developing brain and heart linked to neonic exposures. His comments can be found here <https://bit.ly/3cM0CU7>. Endocrine disrupting chemicals have long lasting and transgenerational or epigenetic effects. Your definition of "plant" will affect generations beyond those being exposed now. (not to mention the health of our soil and pollinators).

As pesticides, neonics and other systemic pesticides applied to seeds must be regulated by DPR to require registration and tracking of **all treated seeds** and where appropriate denial of registration for particular treated seed products must be taken to protect public health. DPR must add all neonic treated seed products to the "state restricted materials list" as well as list seeds treated with other systemic insecticides as restricted if they meet the standard for restriction.

In order to protect not only human health, but the safety of **our water** and health of our soil and **pollinators**, DPR must accurately define pesticide treated seeds and promote Non-Chemical Pest Control Alternatives - and support research into regenerative agricultural practices that eliminate dangerous chemicals that destroy the precious micro biome of our soil. We hope that DPR will outreach to and support farmers to implement healthier practices wherever possible.

The Public's health and well-being must be a priority, please correct the error of mis definition: Seeds are Plants and pesticides applied to them must be regulated.

Thank you,
Catherine Dodd PhD, RN
Policy Advisor FACTS