



Shaping the future for birds

Jim Hagedorn, Chairman and CEO
The Scotts Miracle-Gro Company
14111 Scottslawn Road
Marysville, OH 43041

William Engler, Jr., CEO
Kaytee Products, Inc.
521 Clay Street
Chilton, WI 53014

April 26, 2013

Dear Sirs,

American Bird Conservancy (ABC) would like to direct your attention to the insecticidal coatings called neonicotinoids that are commonly applied to corn, canola, sunflower, millet, and other types of seeds. Our recently completed scientific assessment concluded that these insecticides are routinely incorporated into seeds and are lethal to birds. We want to ensure that these insecticidal treatments are never found on the bird seed that your companies sell to consumers for feeding pets and wild birds.

American Bird Conservancy recently released its 100-page scientific report on the effects on neonicotinoid insecticides on birds, [*The Impact of the Nation's Most Widely Used Insecticides on Birds*](#). These chemicals are applied as seed treatments in agricultural and horticultural seed products. For some crops such as corn, close to 100 percent of seed on the market is treated. American Bird Conservancy reviewed 200 studies on neonicotinoids including industry research obtained through the US Freedom of Information Act.

The ABC report found that a single corn kernel coated with a neonicotinoid can kill a songbird. Even a tiny grain of wheat or canola treated with the oldest neonicotinoid, imidacloprid, can fatally poison a bird. And as little as $1/10^{\text{th}}$ of a neonicotinoid-coated corn seed per day during egg-laying season is all that is needed to affect reproduction. Low-level exposure to neonicotinoids is associated with a range of potentially debilitating effects such as egg-shell thinning and loss of muscle coordination.

Given that a single neonicotinoid-coated seed can fatally poison a bird, it is important that the seeds you market for home bird feeders remain free of these chemical treatments. In response to past wild bird seed contamination incidents, ABC has implemented random testing of the bird seed sold by major retailers. To date, ABC's independent bird-seed testing efforts have focused on older products such as the organophosphorous and carbamate pesticides. Neonicotinoids are also now a candidate for future testing.

Since the use of neonicotinoid coatings is nearly ubiquitous in many seed crops grown in the United States, American Bird Conservancy is requesting your assurance that the seeds sold by your company for use in home-use bird feeders remain free from neonicotinoid insecticides. It would be unfortunate if bird watchers were unknowingly poisoning the very birds that they seek to nurture and enjoy with their families. We would appreciate if you could provide us with documentation showing that your bird-seed supply chains are indeed pure and free of imidacloprid, clothianidin, thiamethoxam, and other neonicotinoid insecticides.

Thanks for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia M. Palmer".

Cynthia Palmer
Manager, Pesticides Program
American Bird Conservancy
www.abcbirds.org
Tel. 202 234 7181 w
cpalmer@abcbirds.org