



Pollinator Stewardship Council

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October 4, 2014

Biopesticides and Pollution Division (BPPD)

Robert McNally

Office of Pesticide Programs, EPA

28221T

1200 Pennsylvania Ave, NW

Washington, D.C. 20460-0001

Re: PP 3F8205 --EPA-HQ-OPP-2013-0758 *requests to amend the tolerances in 40 CFR 180.565 for residues of the insecticide, thiamethoxam (3-[(2-chloro-5-thiazolyl)methyl]tetrahydro-5-methyl-N-nitro-4 H-1,3,5-oxadiazin-4-imine) and its metabolite[N-(2-chloro-thiazol-5-ylmethyl)-N'-methyl-N'-nitro-guanidine*

Dear Mr. McNally,

The beekeeping industry is responding to the request to amend thiamethoxam tolerances and add new tolerances (PP 3F8205) for grain, soybean, legume, and sunflower crops as published in docket #EPA-HQ-OPP-2013-0758, September 5, 2014.

We have significant concerns over the recent request by Syngenta to raise residue tolerances for thiamethoxam and clothianidin on major cropping systems in the U.S. The beekeeping industry is concerned about the magnitude of the requested increase. Increasing the existing tolerances in or on alfalfa forage from a level of 0.05 to 10 ppm (parts per million) is an increase of 200 times, and the increase of 0.12 to 8 ppm on alfalfa hay is an increase of 64 times the previously allowed levels. The new tolerance levels for “corn, field, forage from 0.10 to 4 ppm” is 40 times the previously allowed levels. We fear allowing such increases in levels of exposure of 40 to 200 times will seriously impair the health of honey bees. The mounting research on toxicity of these compounds to honey bees and other non-target species will seriously increase the chemical burden debilitating and decimating pollinator health and population.

The scale at which these changes will be deployed upon the landscape affecting so many honey bee attractive crops, as well as pollinator forage near agriculture is contradictory to the USDA support of pollinator forage in CRP lands, as well as the Presidential Memorandum to support honey bee health.

These proposed tolerance levels are based on harvested crops, and do not reflect what the honey bees are exposed to in foraged pollen, nectar, or water. Residues during the season of foraging will likely be higher.

To allow these increases in the use of thiamethoxam, would result in increased residues in the crops. “The dose makes the poison” both acute and chronic, and this chemical is already toxic to honey bees at the current use levels. Pesticide exposure results in compromised fitness of the colony organism based on observations in the field. To allow these increases in the use of thiamethoxam, which will result in increased residues in the harvested crops, without conducting environmental field studies on agricultural lands that have had neonicotinoids applied for a number of years, will be a breach of EPA regulatory responsibility.

Therefore, we strongly urge the EPA to reject this request for increased tolerances and additional uses.

Sincerely,



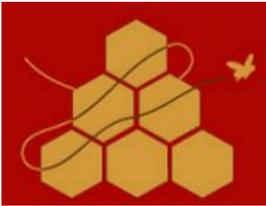
A handwritten signature in black ink, appearing to read 'Dave Hackenberg'.

Dave Hackenberg, Co-Chair

A handwritten signature in black ink, appearing to read 'Bret Adee'.

Bret Adee, Co-Chair

National Honey Bee Advisory Board



A handwritten signature in black ink, appearing to read 'Randy Verhoek'.

Randy Verhoek, President

National Honey Producers Association



A handwritten signature in black ink, appearing to read 'Tim Tucker'.

Tim Tucker, President

American Beekeeping Federation



A handwritten signature in black ink, appearing to read 'Bret Adee'.

Bret Adee, President

Pollinator Stewardship Council

A handwritten signature in black ink, appearing to read 'Steven Coy'.

Steven Coy

Beekeeping industry representative to EPA's Pesticide Program Dialogue Committee