



Pollinator Stewardship Council

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Feb. 10, 2014

Environmental Protection Agency (EPA/DC)
 Fred Jenkins, Designated Federal Officer
 Office of Science Coordination and Policy
 28221T
 1200 Pennsylvania Ave, NW
 Washington, D.C. 20460-0001

Re: Nominations to the FIFRA Scientific Advisory Panel

Docket: HQ-OPP-2013-0776

Dear Mr. Jenkins,

Please accept our support for the following nominees for the FIFRA Scientific Advisory Panel (SAP) as posted in the public docket. The Pollinator Stewardship Council represents commercial beekeepers who both produce honey, and provide crop pollination services, honey bee breeders, and urban/suburban beekeepers.

Considering pollinator losses are the most visible and difficult problem the EPA is confronting at this time, it would seem important the nominee's entomological experience be unencumbered by pesticide manufacturer influence. We are disappointed eleven researchers were "not available" for the FIFRA SAP, specifically Dr. Bradman, Dr. Davidson, Dr. Slotkin, and Dr. Relyea.

Of the remaining nominees we reviewed their qualifications and research and support the following nominations of:

- #1- Dr. Dana Boyd Barr
- #2- Dr. Paul D. Blanc
- #3- Dr. David Alan Jett

The Pollinator Stewardship Council's mission is to defend managed and native pollinators vital to a sustainable and affordable food supply from the adverse impact of pesticides.

The Pollinator Stewardship Council is a 501(c)(3) nonprofit organization; all deductions are tax deductible, EIN 46-0811836

We were impressed by Dr. Barr's experience with the Centers for Disease Control and Prevention, especially her assessments of human exposure to current use pesticides. We also recognized her work in determining appropriate matrices to monitor pesticide exposure at each life stage. We support the nomination of Dr. Dana Boyd Barr to the FIFRA SAP for a term starting in 2014.

We encourage the EPA to accept Dr. Paul D. Blanc to the FIFRA SAP due to his work in occupational and environmental medicine. His work with the California Scientific Review Panel for the Toxic Air Contaminant program has been impressive, and we believe he would be an asset to the FIFRA SAP for a term beginning in 2014.

While the Scientific Advisory Panel only has two vacancies in 2014, we wish to acknowledge a third nominee in case Dr. Barr or Dr. Blanc become unavailable. Dr. David Alan Jett's work concerning the impact of pesticides upon the nervous system, as well as the molecular and cellular mechanisms of cognitive and neural development we believe is important work relative to pollinators.

We encourage EPA to nominate researchers with diverse educational, research, work, and life experience for the FIFRA SAP. In order to fully review and analyze product registrants (their research and products) to EPA the Scientific Advisory Panel must be comprised of scientists who are unbiased, respected in the field (and outside of it), and who accept the great responsibility of the mission of the EPA: to protect human health and the environment.

EPA's purpose is to ensure that:

- all Americans are protected from significant risks to human health and the environment where they live, learn and work;
- national efforts to reduce environmental risk are based on the best available scientific information;
- federal laws protecting human health and the environment are enforced fairly and effectively;
- environmental protection is an integral consideration in U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy;
- all parts of society -- communities, individuals, businesses, and state, local and tribal governments -- have access to accurate information sufficient to effectively participate in managing human health and environmental risks;
- environmental protection contributes to making our communities and ecosystems diverse, sustainable and economically productive; and
- the United States plays a leadership role in working with other nations to protect the global environment.

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We support the following nominees for the 2014 vacancies on the FIFRA Scientific Advisory Panel.

#1- Dr. Dana Boyd Barr

#2- Dr. Paul D. Blanc

#3- Dr. David Alan Jett

Sincerely,



Michele Colopy
Program Director

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