



Pollinator Stewardship Council

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Federal Strategy “Enhances” Pollinator Health

The Pollinator Health Task Force released their long-awaited report this morning. While the National Strategy to Promote the Health of Honey Bees and Other Pollinators is directed toward pollinator advocates, beekeepers, pesticide manufacturers, federal and state regulators, farmers, and land managers (public and private), the report emphasizes the need for “all hands on deck,” which does include the individual citizen. You can read the Strategy, Action Plan, and more [at this link](#). “In implementing the Strategy, the Federal agencies will lead by example, and will also more fully engage public and private partners in academia, non-governmental organizations, private industry, state and local governments, foundations, and private citizens.”¹ The report outlines strategies Federal agencies will enact pertaining to landscaping around (and on top of, in the case of rooftop pollinator gardens) Agency office buildings; guidelines to include pollinator plantings for any new landscaping; and use/enhancement of habitat for pollinators. One distinction was clarified between habitat restoration and habitat enhancement. Habitat enhancement, “the manipulation of the physical, chemical, or biological characteristics of an undisturbed or degraded site to heighten, intensify, or improve specific functions or to achieve a specific purpose.”² As such pollinator habitat will be “enhanced” more than “restored.”

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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.

Key concerns for the Pollinator Stewardship Council are the impact of pesticides upon pollinators. The National Strategy addresses our concerns acknowledging “exposure to pesticides”³ as one of stressors impacting pollinator health. We appreciated the acknowledgment of the effects of herbicides upon pollinator nutrition and habitat loss. The National Strategy provided national voice to our mission to reduce pesticide exposure to pollinators. “It is the misuse and overuse of these pesticides that leads to adverse ecological and human health consequences.”⁴ The Pollinator Stewardship Council supports the “need for Integrated Vegetation and Integrated Pest Management (IVM, IPM) as sustainable approaches to ‘managing pests by combining biological, chemical, cultural, mechanical and physical tools in a way that minimizes economic, health, and environmental risks.’”⁵

EPA’s tasks in this National Strategy include:

- Issue new toxicity study guidelines to more fully protect honey bees.
- Re-evaluate the neonicotinoid family of pesticides.
- Analysis of neonicotinoid seed treatments.
- Assess other pesticides for their potential impacts on pollinators.
- Restrict the use of pesticides that are acutely toxic to bees.
- Work with States and Tribes to issue pollinator protection plans.
- Reduce exposures during the planting of pesticide-treated seed.
- Evaluate and mitigate impacts on monarch butterflies.
- Issue guidance of bee incident report inspections.
- Expedite review of new Varroa mite control products.

A number of these actions have already been completed. Oxalic acid was recently approved for legal use to combat Varroa mites in hives, and the Guidance of bee incident report inspections was completed in 2013. We will be interested in EPA’s draft outline “it intends to take to protect monarch butterflies” balancing monarch protection and weed management.⁶ We are supportive of efforts to “conserve milkweed species from effects of herbicides,” and to EPA’s prospective actions “ranging from pesticide label instructions, to spray drift buffers” to

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protect milkweed resources. The Pollinator-Friendly Best Management Practices (BMP) for Federal Lands are concise directives to protect pollinators. These BMPs are replicated already in a variety of crop BMPs, and State Agricultural Department BMPs: but they are still voluntary. There is no enforcement to a best management practice.

EPA's contribution to the National Strategy is to issue guidance for bee incident report inspections. That guidance document was released in 2013, but did not reflect guidelines for enforcement. Even though "EPA has required states to report bee kill incidents as part of the Cooperative Grant Guidance through which states receive funding to support inspections," enforcement is still lacking. Far too many states lack funding for bee inspectors to investigate bee kill incidents, and lack the funding to perform the necessary laboratory testing of evidence of a bee kill incident. Enforcement cannot happen without evidence, and the collection and analysis of evidence of a bee kill incident needs funded. Bee kill incident data is valuable information for EPA when re-assessing pesticides. Without funding to support investigations, and lab analysis to determine the cause of the bee kill incident, then bee kill incidents will continue to be "anecdotal."

We appreciate EPA's contribution to the Strategy in the new harmonized guidance for assessing pesticide risks to pollinators, to re-evaluate the neonicotinoid family of pesticides, conduct a benefit analysis of seed treatments, and reduce exposures during the planting of pesticide-treated seed. Most importantly, the Pollinator Stewardship Council welcomes the assessment of "other pesticides for their potential impacts on pollinators," and "to restrict the use of pesticides that are acutely toxic to bees."⁷ One class of pesticide is not the only chemical toxic to honey bees. "Many pesticides can affect honey bees and other pollinators, especially when misapplied contrary to label requirements."⁸ However, tank mixes of pesticides are often applied per the label, and yet they create synergistic effects between the chemicals, often increasing the toxicity levels of the mix of chemicals, thus causing harm to honey bees. Label language can be adjusted, pollination contracts can be written to reduce bee losses, and state pollinator plans can be developed with local solutions for contracted pollinator services, but bee

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kills will continue to occur. Enforcement in state pollinator protection plans will be the most difficult concern for the states to address. We cannot ignore pollinators as the “indicator of biodiversity and ecosystem health.”⁹ The Action Plan EPA presents addresses these concerns, except enforcement. We do, however, appreciate most of the economic priority areas as defined in the Action Plan for EPA, as without a monetary value of pollination services, the risk to human food pricing due to pollinator loss, and the decrease of food sources for pollinators, our honey bees and beekeeping will continue to be thought of as expendable.

This National Strategy “focuses on both immediate and long-term changes that can be made to improve the well-being of pollinator populations,”¹⁰ and “ensure a level of pollinators that would sustain agricultural production, and protect the health of the environment for the foreseeable future.”¹¹ For a strategy to be successful all stakeholders must be welcomed to participate in the action plans, the metrics, and the priority actions. Success is needed sooner, rather than later for the sake of the honey bee, native pollinators, and the beekeeping industry.

¹ National Strategy to Promote the Health of Honey Bees and Other Pollinators, page 8.

² Ibid, pg. 12

³ Ibid, pg. i

⁴ Ibid, pg. 47

⁵ Ibid, pg. 47

⁶ Ibid, pg. 51

⁷ Ibid, pg. 49

⁸ Ibid, pg. 49

⁹ Ibid, pg. 10

¹⁰ Ibid, pg. 1

¹¹ Ibid, pg. 11