Pollinator Stewardship Council
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March 4, 2015

Susan Lewis, Registration Division (RD) (7505P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Re: Docket ID number: EPA-HQ-OPP-2015-0043; Oxalic Acid Dihydrate

Dear Ms. Lewis,

Registering oxalic acid to aid beekeepers in controlling their Varroa mite populations is an important tool in managing the health of honey bees. Beekeeping is a diverse industry of commercial, sideline, and backyard beekeepers. Our honey bees encounter different stresses; pests, pathogens, pesticides, and poor forage in varying levels of severity. The registered use of oxalic acid will be another tool to help beekeepers. Not all beekeepers may use this product now that it is registered. While other beekeepers have been using it, off -label for years as the product had been registered for use on honey bees in other countries. Honey bees experience a broad area of the environment, and work tirelessly to pollinate our crops and wild lands. Having another tool to aid in controlling Varroa mite would help reduce the pest and pathogen stress upon our honey bees. However, this is not THE solution to honey bee health declines. Honey bees need pesticide free forage for a diverse, nutritional, natural food supply. Pesticide free forage will support our native pollinators as well. Honey bees would be healthier if the levels of bee toxic pesticides were reduced, and IF used applied when they least affected honey bees and pollinators. Using short residual toxicity pesticide products, and NOT applying them during bloom would greatly support pollinator health. These actions would improve the immune systems of honey bees with or without the additional use of oxalic acid in the colony. Additionally, herbicides, fungicides, insecticides, their adjuvants, surfactants, and "inert ingredients" need to be analyzed for their synergistic actions and their pre-lethal effects upon honey bees. Research has shown it is NOT just mites killing honey bees.

The Pollinator Stewardship Council supports the approval of registering oxalic acid for in-hive use to control Varroa mites.

Formally,

Michele Colopy
Program Director