



Pollinator Stewardship Council
1624 Idlewood Ave., Akron, OH 44313
www.pollinatorstewardship.org
832-727-9492

Oct. 27, 2016

Contact: Michele Colopy, Program Director
progdirector@pollinatorstewardship.org

Sulfoxaflor: Re-registered

EPA has re-registered the bee toxic pesticide, sulfoxaflor. This re-registration comes after the US beekeeping industry filed an appeal in the U.S. Ninth Circuit Court of Appeals challenging EPA's registration of sulfoxaflor due to lack of data and protections for pollinators in July 2013. Ruling in the beekeeping industry's favor, the court vacated and remanded sulfoxaflor's registration in September 2015.

In announcing its re-registration decision, EPA states it has eliminated exposure from sulfoxaflor to honey bees on pollinator attractive plants in bloom by:

- Removing certain bee attractive crops from the label such as cotton, citrus, and soybeans.
- Allowing use for certain annual bee attractive plants, such as canola, and some beans after petal fall.
- Allowing use for many bee attractive plants which are harvested before bloom such as broccoli, carrots, and onions.
- Removing turf grass uses, except for sod farms, which will greatly protect native pollinators in urban areas, parks and, golf courses.
- Prohibiting homeowner use.
- Requiring a 12 foot in-field buffer where blooming vegetation exists downwind of the application site for all uses.
- Addressing tank mixing for the insecticides and fungicides that are known to be synergistic. (The label requires the applicator to visit a website within one week of application to determine if additional pesticides have been added to the list of known synergistic pesticides.)

- Prohibiting use for bee attractive plants, including turf grass, grown for seed. ¹

Pollinator Stewardship Council is pleased that EPA has taken action in response to the court ruling to reduce the risk to pollinators. However, we remain concerned that EPA believes the “bee hazard warning” is not necessary for the sulfoxaflor label. The Pollinator Stewardship Council does not share this belief. We feel that it is imperative to retain the standard, “*This product is very highly toxic to bees and other pollinating insects*” in the Environmental Hazards statement, to “inform” the applicator(s) the why of “*Do not apply this product until after petal fall. If blooming vegetation is present 12 feet out from the downwind edge of the field, a downwind 12-foot on-field buffer must be observed.*” EPA uses the pesticide product label to mitigate the risk of using any pesticide, and where a pesticide presents a potential risk to pollinators, the cautionary language is necessary and appropriate.

While EPA has attempted to mitigate the risks to pollinators with label and use changes for sulfoxaflor, this class of pesticide, sulfoxamines, is recognized as presenting great risk to pollinators globally. Researchers recently published a report “A horizon scan of future threats and opportunities for pollinators and pollination” finding “sulfoximine, a novel systemic class of insecticides” to be the *second of six high priority issues threatening pollinators*. The researchers exclaim, “future sustainability of pollinators and the service they provide requires anticipation of potential threats and opportunities before they occur, enabling timely implementation of policy and practice to prevent, rather than mitigate, further pollinator declines.” ²

¹ Sulfoxaflor pesticide label <https://www.regulations.gov/document?D=EPA-HQ-OPP-2010-0889-0410>
A horizon scan of future threats and opportunities for pollinators and pollination

² <http://pollinatorstewardship.org/wp-content/uploads/2016/09/Future-threats-and-opportunities-for-pollinators-peerj-2249.pdf>
Decision to Register the Insecticide Sulfoxaflor with Limited Uses and Pollinator Protective Requirements
<https://www.epa.gov/ingredients-used-pesticide-products/decision-register-insecticide-sulfoxaflor-limited-uses-and>

Section 18 search requests to EPA <http://iaspub.epa.gov/apex/pesticides/f?p=SECTION18BKUP:6:::NO:::>

EPA Registration docket link <https://www.regulations.gov/docket?D=EPA-HQ-OPP-2010-0889>

Closer label https://www3.epa.gov/pesticides/chem_search/ppls/062719-00623-20161014.pdf

Transform label https://www3.epa.gov/pesticides/chem_search/ppls/062719-00625-20161014.pdf

Sulfoxaflor label Technical https://www3.epa.gov/pesticides/chem_search/ppls/062719-00631-20161014.pdf