



Pollinator News

April 17, 2015

MP3s—Your questions

Beekeepers have been making their voices heard concerning the Managed Pollinator Protection Plans (MP3). Developing the State Managed Pollinator Protection Plans is not a “mandate” from the federal government. However, reviewing the letter from EPA to AAPCO it is “beneficial” to states to complete a plan. Read the letter from EPA to AAPCO at this link [http://pollinatorstewardship.org/wp-content/uploads/2015/04/Attachment_2 - USEPA Letter AAPCOSFIREG State Pollinator Plan.pdf](http://pollinatorstewardship.org/wp-content/uploads/2015/04/Attachment_2_-_USEPA_Letter_AAPCOSFIREG_State_Pollinator_Plan.pdf)

There is no specific federal funding available. States, groups, or coalitions could seek USDA, EPA, State Specialty Crop Grant, SARE or private foundation funding to support planning efforts. Motivations to complete an MP3 for beekeepers are to correct some of the incorrect statements about bees appearing on pesticide labels. Some labels state honey bees will not forage at less than 55 degrees Fahrenheit. That is incorrect. Honey bees and native pollinators are known to forage at temperatures as low as 42 degrees Fahrenheit. Bees will not forage after 3:00 p.m. is another fallacy on the federal pesticide label. Whenever this is mentioned in beekeeping meetings, all beekeepers “guffaw.” We know, we see our honey bees working from sunrise to sunset. The 48 hour notice to move bees so pesticides can be applied to a blooming crop is not a reasonable mitigation measure. It reduces the amount of time bees can pollinate a crop. And if the pesticide used has an extended residual toxicity, bees will die when they return to pollinating the crop, still reducing the crop yield due to the loss of bees alive to pollinate the crop. If a beekeeper is willing to move their bees where is their pesticide free forage for the beekeeper to place their bees?

Apiary registrations whether voluntary or mandatory are not the panacea to pesticide related bee kills. Voluntary registration, and use of these apiary websites, or sensitive crop registry websites are not enforceable. The very nature they are voluntary gives a false sense of responsibility and communication. The “48 hour notice to move bees” is part of the digital registry programs. If a beekeeper is told to move their bees, and they do not, the responsibility for any bee losses due to the pesticide application falls to the beekeeper. The “48 hour notice to move bees” misses the point of the registry programs. These should be used to open communication, not speak in ultimatums. The registry programs could work better, if they opened a conversation between beekeeper, applicator, and farmer about the pesticides being selected. Is there a product to address the pest with a short residual toxicity? Can the short residual toxicity product be applied at night? How much of the crop has been pollinated, remains to be pollinated, and how will removing bees affect the crop yield? What is the pest threshold level as determined by Integrated Pest Management practices? If pollination is nearly completed, can the application be delayed a few days, so pollination can increase the crop yield? The registry programs

should “start” a conversation between the agricultural stakeholders for the best management practice that will lead to increased crop yields, and healthy bees available to pollinate the next farmer’s crop. Instead, the “48 hour notice to move bees” is a label directive that has often become an ultimatum that stops communication.

The Presidential Memorandum on Pollinator Health directed the EPA and other federal agencies to “work with states.” The Presidential memo is being translated into a White House Task Force Report on Pollinator Health that was to be released in Dec. 2014, but is now slated for some time this April. While the federal government is directed to “work with states,” the states must work with all of the stakeholders. *Facilitators of the MP3 planning meetings must be willing and capable to bring the stakeholders together, to listen to all the needs of the stakeholders, and to guide the stakeholders into developing actions which will result in a strategy where the MP3’s are truly protecting pollinators.* The stakeholder planning meetings for the MP3s should not be “rubber stamps” of one industry, one regulatory agency, or one individual. Gathering stakeholders does not mean securing like-minded people to approve the adoption of another states MP3. Even the AAPCO Committee Report states:

“Development and implementation of managed pollinator protection plans depend on effective engagement of the stakeholders. This involves direct meetings of beekeepers, crop producers, landowners, crop advisors, and others as needed. Identifying and engaging stakeholders can be a hurdle for plan development.” page 3, AAPCO Committee Report (http://pollinatorstewardship.org/wp-content/uploads/2015/04/AAPCO_Committee_Report_-_2315.docx)

Official Representatives of all State agricultural associations, including apiculture should constitute the composition of the MP3 stakeholder planning group. Leadership, or members appointed by the state agricultural/apicultural associations’ leadership, should be invited to participate in the MP3 stakeholder planning group. Representatives of State agricultural associations could provide up to three official representatives from their state associations to serve on the MP3 planning group/process.

Many beekeepers of a State Beekeeping Association maintain honey bees on their own property, and on their own farms to pollinate their own (and often their neighbor’s) crops. Beekeeping is comprised of three distinct types of beekeeping: backyard, sideliner, and commercial, and should include all of those viewpoints in the MP3 process. State Beekeeping Associations represent ALL beekeepers, and are the group to represent all beekeepers in the state. All beekeepers are involved in honey production and pollination in their state. Their honey bees pollinate local garden, city floral-scapes, city and state parklands, as well as crops. All beekeepers are involved in honey sales from the local farmer’s market, local and regional grocer retailers, as well as honey wholesalers. State Associations by their very nature represent all beekeepers in their state. One beekeeper performing one category of beekeeping does not “represent” the entire beekeeping industry for the state. Representatives of all state agricultural associations, including apiculture should constitute the composition of the MP3 planning groups. Protecting pollinators does not stop at the crop field edge, but should include protection of pollinators in our cities from mosquito abatement programs. Including city and urban beekeepers, who are pollinating our cities, and backyard and community gardens, provides for the “broad stakeholder consensus” these state MP3’s will need in order to be successful, and protect pollinators.

Adopting another states MP3 was an issue in the AAPCO report as well.

“There are large differences in crop production practices, managed pollinator practices, timing of placement of managed pollinators in and near crops, pest management issues, ownership of crop producing areas and of managed pollinator types across the country. This large amount of diversity makes it unlikely that a single set of pesticide use directions can accommodate all the situations that arise in a way that both reduces all risk to managed pollinators and provides flexibility for crop producers to adequately protect crops.” (page 4, AAPCO Committee Report (http://pollinatorstewardship.org/wp-content/uploads/2015/04/AAPCO_Committee_Report_-_2315.docx)

This “large amount of diversity” is what should motivate states to create their own Pollinator Protection Plans.

The AAPCO Committee Report clarifies the value of MP3s: “The objective, to the extent possible, will be to build a broad stakeholder consensus on effective strategies for protecting pollinators that are the least disruptive to production agriculture and other affected stakeholders.” (page 1, AAPCO Committee report.) The AAPCO Committee will urge stakeholders to identify different state scenarios, and the “attendant differences in management issues, to the USEPA during the comment period expected after announcement of the proposed pollinator protection policy.”

So we all wait. We wait for the White House Task Force Report on Pollinator Health; we wait for the public comment period concerning state pollinator protection plans. Beekeepers must however, be prepared to participate; to be at the table, to be a representative of the agricultural stakeholder called “beekeeper.” Our honey bees (and the native pollinators) are relying on us.

To review the AAPCO Committee Report, the EPA letter to AAPCO, the Pollinator Stewardship Council comparison chart of MP3 plans, and more visit http://pollinatorstewardship.org/?page_id=2816

March 31st more than eighty people attended the first meeting of Hoosier agricultural stakeholders concerning their pollinator protection plan. **Thirty of those in attendance were BEEKEEPERS!!**



“Since lab tests are so critical to protecting our health and the environment, you would think they would be widely used to help monitor the eighty thousand synthetic chemicals in common use today . . . the number of laboratories serving the Office of Pesticide Programs of the EPA had dropped from a dozen in 1971 to a half dozen in 1979 . . . in 2004, there were two.” Poison Spring: the secret history of pollution and the EPA, by E.G. Vallianatos with McKay Jenkins, 2014, page 3