

September 14, 2015

Dr. Richard Bonnano, President
Massachusetts Farm Bureau Federation, Inc.
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Ms. Taryn LaScola, Pesticide Inspector, Crop & Pest Services
Commonwealth of Massachusetts
Department of Food and Agriculture,
Division of Regulatory Services, Pesticide Bureau
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Dear Dr. Bonanno and Ms. LaScola,

The eight county beekeeping organizations listed below are writing to provide input, as requested, to your document titled "Draft MA Pollinator Stewardship Framework." It is our understanding that this document is intended to be the framework for the Commonwealth's program to protect pollinators, including honey bees as required by the Federal Government. The MA Farm Bureau has spearheaded this effort in the words of your cover letter, "to bring together a diverse group of individuals to discuss the issues to create a framework for a state strategy to improve pollinator health."

During the process of responding to your request we have communicated with the bee community across the Commonwealth, and we found that the majority of beekeepers in Massachusetts were unfamiliar with your efforts. Most were completely unaware that these pollinator discussions were taking place or that your draft was being written, and they did not have any chance to participate in this process. Members of county beekeeping organizations, by far the largest group of beekeepers in this state, are key stakeholders in any pollinator protection plan. We insist on being involved in the development of the program at a representative level.

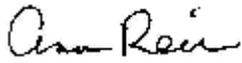
The process of turning a draft framework into an operating state plan is unclear. The request to send copies of comments to the Commonwealth's "Pesticide Inspector, Crop and Pest Services" makes us skeptical that the true intention of your group was to protect pollinators. A review group that largely excludes the stakeholders who keep honey bees, but instead welcomes the stakeholders who make a living applying pesticides, is suspect from the start.

The inclusion and future due notice to all county beekeeping organizations and a voting system that ensures beekeepers have a representative vote in the final content of the Commonwealth's Pollinator Protection Plan and Framework is essential. Each and every member of county beekeeping organizations across the state shall be included in any further discussions about our state pollinator plan as each and every one of us are stakeholders who pollinate local and native plants in Massachusetts. We expect these discussions to be open to the public and include input from a majority of beekeepers in the Commonwealth.

The undersigned individuals represent eight county beekeeping organizations with a combined membership of over 3,000 Massachusetts beekeepers, and the board of the Massachusetts Beekeepers Association. We have read and discussed the Farm Bureau's Draft Pollinator Stewardship Framework document. Our response document is attached as approved by our various Boards of Directors, often unanimously.

Sincerely,

(See page 2)



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