



## Managed / Native Pollinator Protection Plans

The Pollinator Stewardship Council began communicating with beekeepers about the State Managed Pollinator Protection Plans in March 2015 through their newsletter. These MP3s as they are also known are being tasked to each State by the U.S. Environmental Protection Agency. The Pollinator Stewardship Council has compiled MP3s from various states and placed it on our website, as well as Task Force/Workgroup reports in states as they gather the necessary information to develop their Plans.

To support local decision-making relative to pollinator protection, State and Tribal entities need:

- Quality label data and language
- Knowledge of inert / other ingredients within pesticide products
- Knowledge of tank mixes to effectively deal with issues associated with adequate label guidelines and synergism of products
- Proper pesticide application timeframe for various crops

*Beekeepers should not suffer the loss of their livestock simply because they are not under a crop pollination contract. This would not be tolerated in any other area of agriculture.*

### **Beekeepers Need to Be Involved**

Beekeepers must 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. The Pollinator Stewardship Council has worked with beekeepers concerning their State Plans, and provides input as to criteria important to an MP3. *Key to understanding the value and utility of any State Pollinator Protection Plan is what it will, in the end constitute: best management practices or regulation.*

Regulation requires enforcement by regulators. Best Management Practices (BMPs) are the suggested best method(s) to implement to ensure the best results. There is no “enforcement” with BMPs. The stakeholders within each State’s plan development will need to determine where their MP3 will reside; in a State agency of regulation, or a State agency of best management practices (education). Funding (or lack thereof), understanding, and cooperation are key to the MP3 planning process, development, and implementation or enforcement.

### **Pollinator Protection Plan Development**

As we work to protect our managed and native pollinators, stakeholders must remember:

- the pesticide label is the law;
- if a pesticide label states “do not apply to blooming crops or weeds,” that is federal law. This guideline is meant to protect all pollinators.
- voluntary registrations of bee colonies, sensitive crops, etc. are voluntary with no enforcement mechanism to ensure their purpose;
- development of a “real-time” web-based application for mandatory recording of pesticide use is needed.

- in order for States to maintain their Primacy under FIFRA, each State must demonstrate their enforcement programs are active and in compliance with FIFRA.
- States must be required to report all pesticide incidents to the EPA.
- EPA must require pesticide manufacturers to provide to EPA individual incident reports, instead of aggregate totals of pesticide incidents.
- moving bee colonies with a 24-48 hour notice is **not** a reasonable mitigation measure. Notification to move bees places all of the responsibility of bee kills upon the beekeeper. Failure to move bees makes a bee incident the fault of the beekeeper. If the pesticide label is the federal law, the use guidelines per the label are the enforceable language, “do not apply to blooming crops or weeds.” States cannot create a law or guideline that weakens federal law.
- native pollinators are not notified of pending pesticide applications, and instead are sacrificed; reducing crop yield, and reducing the diversity of the landscape.

### Pollinator Protection Plans:

Pollinator protection must examine and seek remedies to the four factors affecting pollinator health: pesticides, pests, pathogens, and poor forage. Pollinator Protection is a national priority which all stakeholders must implement and practice.

### The Plans:

1. The Federal Pesticide Label will be followed regardless of the mitigation measures included in a State MP3 Plan.
2. The MP3s are supplemental protection to the federal pesticide label.
  - a. The MP3s place managed honey bees into two categories: those honey bees hired to pollinate a crop; and those honey bees **not** under a crop pollination contract.
3. The MP3s must include all stakeholders who are residents of the state.
4. The Plans must reflect the crops, geography, climate, urban, suburban, and rural areas of the state.
  - a. They must reflect pollinator protection for the backyard gardener, corporate landscaper, local government land managers, and similar.

### The Plans Need to Encompass an Understanding of:

5. Native pollinators in the State that contribute to pollination, landscape diversity, and ecosystem balance.
6. Realistic apiary cultural practices
7. Realistic farming cultural practices, and real-world cumulative pesticide exposures
8. Realistic landscape and nursery cultural practices, and real-world cumulative pesticide exposures
9. Realistic public health pest control practices (i.e. mosquitos)
10. A plan to protect current pollinator forage, to increase pollinator forage, and the Plan must ensure the forage is pesticide-free forage.
11. Registered pesticides for the state:
  - a. those state registered pesticides defined as bee toxic, including systemic pesticides, and pesticide coated seeds.
  - b. pesticide application practices that create synergisms of pesticide chemicals, which may result in creating toxicity to pollinators.
  - c. bee toxic pesticides, that are NOT registered for use within the state
    - i. defining enforcement actions to prevent unregistered pesticides in the state from being

- applied in the state
  - ii. funding for alleged pesticide-related bee kills including lab analysis of bees, pollen, nectar, and hive matrices.
  - iii. definition(s) of fines for pesticide mis-use, and remuneration for losses of honey bee livestock.
  - iv. fines should imposed that will deter continued misuse of pesticides.
12. Evaluation tools to determine the effectiveness of pollinator protections
  13. Schedule to review annually for effectiveness, changes in cultural practices, registrations of new pesticides, etc.
  14. Extended residual toxicity and systemic pesticides should not be applied to pollinator attractive crops or weeds in bloom, or be allowed to drift or translocate into pollinator forage.
  15. Integrated Pest Management practices (IPM) should be implemented when applying pesticides during bloom, encouraging the use of short residual toxicity products, and to apply them at night.
  16. Commercial beekeepers access to pesticide-free pollinator forage on public lands (or on lands receiving short residual toxicity pesticides applied at night) needs to be promoted.
  17. Moving or covering hives so pesticides can be applied is not a reasonable mitigation strategy (except in *rare* circumstances).
  18. IPM practices need to be followed according to those best management practices.
  19. Mosquito control products should be applied at night when mosquitos are most active, and pollinators are not. Even though the federal pesticide label allows for exceptions to application guidelines for public health, pollinators and human health can be protected through night applications of short residual toxicity products.

For more information about State Pollinator Protection Plans read our *Pollinator News* issues for:  
March 6, 2015 (<http://pollinatorstewardship.org/?p=2995>) ;  
April, 3, 2015 (<http://pollinatorstewardship.org/?p=3193>) ;  
and April 17, 2015 (<http://pollinatorstewardship.org/?p=3246>) .

You can review other State's Plans at our website at [http://pollinatorstewardship.org/?page\\_id=2816](http://pollinatorstewardship.org/?page_id=2816)

Beekeepers are key to protecting managed and native pollinators. Be a part of your State Pollinator Protection Plan.

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