Pollinator Stewardship Council analysis of the "new label."

www.pollinatorstewardship.org

EPA stated in a letter dated 2-28-14 this new pesticide label will now only apply to a foliar application of clothianidin, dinotefuran, imidacloprid, thiamethoxam, tolfenpyrad, and cyantraniliprole.

This new label was developed due to an undefined, ambiguous, and therefore unenforceable old label. Not one term in this new label is defined.

PROTECTION OF POLLINATORS

APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon  in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at:
http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov

EPA admits exposure to the product "can kill bees and other insect pollinators" by residues, direct contact, ingestion in nectar and pollen, yet if one of the five "conditions" is met bees will be killed, but per the label.

Why state the "ingestion of residues in nectar and pollen" through seed treatments, soil, tree injection, and foliar applications" are harmful to bees and then allow the Applicator to use the product on bee attractive crops in bloom?

This new label, designed for foliar insecticides was going to be "harmonized" for all pollinator toxic pesticides per EPA in Dec.: recently they changed their mind. This new label provides no practical method for avoiding the identified risks.

The Bee Industry strongly objects to sending Applicators to a Pesticide Industry website.

Due to the five conditions on this new label what would constitute a "pesticide incident?"

New Pesticide Label Language and the five conditions where honey bees and native pollinators will be killed.

DIRECTIONS FOR USE

1. FOR CROPS UNDER CONTRACTED POLLINATION SERVICES

Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless the following condition has been met.

If an application must be made when managed bees are at the treatment site, the beekeeper providing the pollination services must be notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.

2. FOR FOOD CROPS AND COMMERCIALLY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS

Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless one of the following conditions is met:

- **The application is made to the target site after sunset**
- **The application is made to the target site when temperatures are below 55°F**
- **The application is made in accordance with a government-initiated public health response**
- **The application is made in accordance with an active state-administered apiary registry program where beekeepers are notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying**
- **The application is made due to an imminent threat of significant crop loss, and a documented determination consistent with an IPM plan or predetermined economic threshold is met. Every effort should be made to notify beekeepers no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.**

3. Non-Agricultural Products:

Do not apply [insert name of product] while bees are foraging. Do not apply [insert name of product] to plants that are flowering. Only apply after all flower petals have fallen off.

Not one of the 5 conditions consider the pesticide's mode of action. None of the conditions make sense for systemic pesticides.

This bee picture is meant to tell the label reader this product is harmful to bees. Based on current icons, it should have a red line across the picture.

Bees have a 3-7 mile forage range! What about bees foraging the treatment site from other properties? Native pollinators are sacrificed, as they are not being moved. What constitutes notifying the beekeeper? This label allows the Applicator to choose the mitigation measure.

The "Do Not Apply" conflicts with the original Environmental Hazard Statement which does not have the "unless" conditions. What about Extended Residual Toxicity pesticides? ERT's can be toxic for weeks!

Bees will forage at temperatures as low as 45 degrees F.

What constitutes notifying the beekeeper? Not all states have an apiary registry program? Moving hives is not a risk mitigation strategy. What about voluntary registry programs; the label makes no distinctions?

Who decides when treatment is needed? What are the criteria for needed treatment? What constitutes notifying the beekeeper? Where is the safe place to move bees?

The new "Admire Pro" label does not have the Non-Agricultural Products statement.