

June 22, 2016

Administrator Gina McCarthy
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

Research shows, bee toxic pesticides are a leading contributor to honey bee decline. On behalf of the undersigned beekeepers and organizations representing millions of members and supporters nationwide, we urge the Environmental Protection Agency (EPA) to take the following specific actions to protect bees, butterflies, birds, bats and other pollinators as well as farmers, beekeepers, farmworkers, and consumers.

Bees and other pollinators are essential to our nation's food supply, farming system, economy, and environment, but they are in great peril. A broad consensus of global scientists are gravely concerned about the world-wide dwindling of pollinators. Bees and other pollinators are responsible for one in every three bites of food we eat and provide nutritious and healthy food. Pollinators contribute significantly to the U.S. and world economy, accounting for nearly \$30 billion to the U.S., and more than \$217 billion to the world agricultural economies. The future of our diverse, healthy food is at risk, and we must reverse these pollinator declines.

The United States celebrates National Pollinator Week in June every year. This year, 2016, let us all work together to protect our food supply, support the pollination of our crops and wild-lands, and strengthen the beekeeping industry, an integral member of the agricultural community.

We urge the EPA to take the following steps:

1. EPA needs to complete a cumulative assessment of the multiple stress factors that managed and native pollinators currently experience including tank mixes, fungicides, insect growth regulators, "other ingredients" in pesticide formulas, and their interactions with bee pests and pathogens.
2. Evaluate the efficacy of acaricides used for Varroa control, the synergisms with crop protection pesticides, and examine non-chemical Varroa controls options.
3. Evaluate systemic pesticide residue levels that may weaken pollinators in the soil prior to creating pollinator habitat. Research has shown the half-life of neonicotinoids remains toxic for up to three years depending upon the soil. Agricultural buffer/pollinator strips, and similar pollinator habitat needs to be protected from pesticide residues in the soil and

water, as well as dust off onto plants in bloom or water sources from coated seed planting.

4. Revise the Tier II Risk Assessment: Field realistic, colony level assessments must be completed when assessing pesticides, including water quality, fungicides, herbicides, insect growth regulators, adjuvants, surfactants, degradates, metabolites, and “other ingredients” in the “formulated grade.”
5. Native pollinators must be included in colony level assessments. While there are unique concerns in assessing native pollinators, they are a valuable contributor to the agricultural economy.
6. Provide research funding of the symbiotic relationship between native pollinators and native plants sociologically and spiritually important to the 562 Tribes residing in the U.S.
7. Conduct research on bee attractive crops for the value of pollination, the value of crop pollination services, and the loss of crop yield when bees are killed.
8. Institute incident reporting of bee losses to include the sublethal effects upon bees; ensure the investigation is not retaliatory, but data collection driven; remove primacy of states that decline investigating bee kills that are under an arbitrary financial threshold. Trends of product use, as well as problem end users can be observed from the loss of one hive as well as the loss of 100 hives. All incident data should be reported to the EPA EIIS database.
9. Initiate prompt suspension based on an imminent hazard determination for systemic pesticides until the above assessments are completed.
10. Institute comprehensive organic and non-toxic based Best Management Practices to protect farmers, crop yields, and beekeepers from the impact of the prophylactic use of pesticides and coated seeds. Integrated Pest Management (IPM) has been co-opted and prophylactic use of pesticides and coated seeds violates the true practice of IPM.

We support beekeepers, we value honey bees and native pollinators, and we need sustainable, affordable, nutritious food. We urge you to implement these steps to support pollinator health, maintain sustainable agriculture, and protect the American food supply.

Sincerely,

Alliance for the Wild Rockies
All-creatures.org
American Bird Conservancy
American Grassfed Association
American Sustainable Business Council

Anacostia Watershed Society
Animals Are Sentient Beings
Appalachian Voices
As You Sow
Bee Love Sacramento
Bee Safe Boulder
Bee Safe Earth
Berkeley Food Institute
Berks Gas Truth
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Family Farm Defenders
Farmworker Justice
Friends of Blackwater
Friends of the Earth
Fair World Project
Farmworker Association of Florida
Food Democracy Now!
Food Chain Workers Alliance
Food Craft Institute
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GMO Free Florida
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Grassroots International
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Green America
Growing Power, Inc.
Health Care Without Harm
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Trillium Assets Management
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Veda Stram - allcreatures.org
Vilicus Farms
War Is A Crime
Washtenaw Food Policy Council
WildCare
Wild Farm Alliance
Wilderness Watch
Wisconsin Environment
Worcester County Beekeeper Association
York County Beekeepers Association

Raritan
Rocky

June 22, 2016

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack,

Research shows, bee toxic pesticides are a leading contributor to pollinator decline. The undersigned organizations representing millions of members and supporters nationwide to urge the U.S. Department of Agriculture (USDA) to take the following specific actions to protect bees, butterflies, birds, bats and other pollinators as well as farmers, beekeepers, farmworkers, and consumers.

The United States celebrates National Pollinator Week in June every year. This year, 2016, let us all work together to support the pollination of our food supply, and strengthen the beekeeping industry, an integral member of the agricultural community.

Bees and other pollinators are essential to our nation's food supply, farming system, economy, and environment, but they are in great peril. A broad consensus of global scientists are gravely concerned about the world-wide dwindling of pollinators. Bees and other pollinators are responsible for one in every three bites of food, thereby providing all of the nutritious and healthy food we eat. Pollinators contribute significantly to the U.S. and world economy, accounting for nearly \$30 billion to the U.S., and more than \$217 billion to the world agricultural economies. The future of our diverse, healthy food is at risk, and we must reverse these pollinator declines.

We urge the USDA to take the following steps:

1. Implement all of the Government Accountability Office recommendations in its March 2016 report regarding pollinator health.
2. To improve the effectiveness of federal efforts to monitor wild, native bee populations, the Secretary of Agriculture, as a co-chair of the White House Pollinator Health Task Force, should coordinate with other Task Force agencies that have monitoring responsibilities to develop a mechanism, such as a federal monitoring plan, that would (1) establish roles and responsibilities of lead and support agencies, (2) establish shared outcomes and goals, and (3) obtain input from relevant stakeholders, such as states.
3. To increase the accessibility and availability of information about USDA-funded research and outreach on bees, the Secretary of Agriculture should update the categories of bees in the Current Research Information System to reflect the native bees, pollinating birds,

bats, and other insects and mammals identified in the White House Pollinator Health Task Force's research action plan.

4. USDA need to restore and enhance bee habitat plantings across the entire nation, including identifying gaps in expertise and technical assistance funding available to field offices. Additionally, to ensure the effectiveness of USDA's bee habitat conservation efforts, the Secretary of Agriculture should direct the Administrators of FSA and NRCS to, within available resources, increase evaluation of the effectiveness of their efforts.
5. USDA labs should remit to tax paying beekeepers free scientific analysis of hive matrices collating data on healthy bee colonies, as well as those exposed to pests, pathogens, and pesticides. This data needs to be made available to beekeepers, the public, and to publically funded research institutions of higher education. Currently, the cost of colony health analysis is prohibitive; contributing to more than forty years of “anecdotal evidence from beekeepers” of the impact of pesticides upon bee health, and little real-world, field-relevant data on honey bee colony health.
6. Revise the pricing system to ensure that farmers receive a fair price in lieu of pricing subsidies and to continue to link crop insurance support with Conservation Reserve Program compliance to increase biodiversity in agriculture and conserve soil and water. USDA should also foster the planting of seeds not coated with neonicotinoids to benefit pollinators and other wildlife, especially on marginal lands.
7. Require agencies to ensure all federal lands, and any new pollinator habitat, is free of systemic pesticides by performing pesticide residue analysis of the soil prior to planting.
8. Ensure tax-payer funds are used effectively for pollinator habitat plantings, and that all pollinator-beneficial flowers planted have not been pre-treated with pesticides.
9. Provide research funding of the symbiotic relationship between native pollinators and native plants sociologically and spiritually important to the 562 Tribes residing in the U.S.

We support beekeepers, we value honey bees and native pollinators, and we need sustainable, affordable, nutritious food. We urge you to implement these steps to support pollinator health, maintain sustainable agriculture, and protect the American food supply.

Sincerely,

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June 22, 2016

Capitol Hill
East Capitol St. NE & First St SE,
Washington, DC 20004

Dear Members of Congress,

Research shows, bee toxic pesticides are a leading contributor to honey bee decline. The undersigned organizations representing millions of members and supporters nationwide urge you to take the following specific actions to protect bees, butterflies, birds, bats and other pollinators as well as farmers, beekeepers, farmworkers, and consumers. The United States celebrates National Pollinator Week in June every year. This year, let us all work together to protect our food supply, support the pollination of our crops and wild-lands, and strengthen the beekeeping industry, an integral member of the agricultural community.

Bees and other pollinators are essential to our nation's food supply, farming system, economy, and environment, but they are in great peril. A broad consensus of global scientists are gravely concerned about the world-wide dwindling of pollinators. Bees and other pollinators are responsible for one in every three bites of food, and provide all of the nutritious and healthy food we eat. Pollinators contribute significantly to the U.S. and world economy, accounting for nearly \$30 billion to the U.S., and more than \$217 billion to the world agricultural economies. The future of our diverse, healthy food is at risk, and we must reverse these pollinator declines.

We urge you, and Congress to take the following steps:

1. Ensure USDA and EPA implement all of the Government Accountability Office recommendations in its March 2016 report regarding pollinator health.
2. To require EPA to secure accurate information concerning the schedules for completing the pesticide registration reviews for existing pesticides required under the Federal Insecticide, Fungicide, and Rodenticide Act by December 2016.
3. Commit to funding bee research at EPA and USDA concerning real-world, field relevant impacts to honey bee and native pollinator health; including pesticides, pests, pathogens, and poor forage.
4. Commit to funding an EPA analysis of the efficacy of pesticides and the economic costs of pesticides to pollinators, including seeds coated with systemic pesticides, and the impact of pesticides to the beekeeping industry.

5. Fund, create, and require a user friendly, real time, data driven pesticide incident reporting system for the United States tracking the health of bee colonies, and the field-relevant, scientific data collection of issues impacting pollinator health. Include in incident reporting bee losses due to sublethal effects of pesticides upon bees; ensure the bee kill investigation is not retaliatory, but data collection driven; remove FIFRA primacy of states that decline investigating bee kills that are under an arbitrary financial threshold. Trends of product use, as well as problem end users can be observed from the loss of one hive as well as the loss of 100 hives. All incident data should be reported to the EPA EIIS database.
6. Commit to funding USDA efforts to use tax-payer funds wisely and effectively to create verifiable pesticide-free pollinator habitat in support of pollinator health.
7. Provide research funding of the symbiotic relationship between native pollinators and native plants sociologically and spiritually important to the 562 Tribes residing in the U.S.
8. Commit to funding USDA labs to provide free, reliable, independent scientific analysis of hive matrices collating data on healthy bee colonies, as well as those exposed to pests, pathogens, and pesticides. Currently, the cost of colony health analysis is prohibitive; contributing to more than forty years of “anecdotal evidence from beekeepers” of the impact of pesticides upon bee health, and little real-world, field-relevant data on honey bee colony health. Beekeepers are tax payers, and rely on the USDA labs for unbiased bee health research and analysis of bee health issues.
9. Remove the “treated article” exemption from the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), and require registrations under FIFRA for all coated seeds or plants that shed pollen.
10. Fund the Farm Bill to encourage biodiversity in agriculture, especially on marginal lands, support crop yields, conserve soil and water, and provide benefit to pollinators and other wildlife.

We are most concerned about the integrity of tax-payer funded research. Congress should ensure the Inspector General provides oversight for scientific integrity at the USDA. Congress needs to protect and support USDA and EPA scientists affirming their freedom to publish their research, freedom from USDA/EPA Departmental bias affecting research, and freedom from USDA/EPA supervisory retaliation for performing their scientific research.

We support beekeepers, we value honey bees and native pollinators, and we need sustainable, affordable, nutritious food. We urge you to implement these steps to support pollinator health, maintain sustainable agriculture, and protect the American food supply.

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