Bayer CropScience

February 3, 2016

To: House Committee on Agriculture and Forest Products

Subject: Response to Proposed House Bill 539

Dear Honorable Representatives,

This letter is in response to the proposed legislation regarding the establishment of a Pollinator Protection Committee, as represented in House Bill 539 (H539). Bayer shares Vermont's commitment to protect pollinators and we appreciate the opportunity to provide our comments to this committee regarding this bill. Additionally, we would like to share with you some of the ways Bayer is working to improve pollinator health.

Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

H539

In general, we support the formation of the Pollinator Protection Committee (Committee) and would like to suggest the following ways we think H539 could be substantially improved:

Purpose

The purpose of H539 is to "to evaluate the causes of reduced pollinator populations in the State and to recommend measures the State can adopt to conserve and protect pollinator populations." To achieve this goal, it is important that the Committee conduct a thorough review of the current pollinator population so that a proper benchmark is established for future assessment. For example, nationally and in many states, the number of honey bee colonies is not in decline, but has been increasing for the past decade. Since the database for other pollinator species is lacking, an accurate survey would help inform the Committee's potential recommendations.

Scope

We support the Committee's mission to "recommend measures the State can adopt to conserve and protect pollinator populations," however we disagree with the bill's focus, which appears limited to the regulation of pesticides and specifically to neonicotinoid insecticides. Regarding honey bees, most experts agree that there are multiple factors associated with colony decline. A narrow focus on pesticides implies that additional restrictions on their use will positively impact bee health, even though there is no evidence to support this claim.

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A more holistic approach to bee health is consistent with the findings of the Vermont Agency of Agriculture's recent investigation, which specifically investigated neonicotinoid use and safety in the state. As the 2015 report noted, "In the few instances of honey bee decline that were reported to the Agency of Agriculture, in those cases, no correlation was identified between *any* type of pesticide and the decline." We believe the adoption of measures to improve pollinator habitat and forage, as outlined in the President's national strategy issued by the Pollinator Health Task Force in 2015 would be helpful in achieving H539's intended purpose.

Membership

We suggest this bill would be strengthened by the inclusion of a farmer to provide greater balance, but we have no objections to the committee's composition, as currently proposed.

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Bayer and Bee Health

For nearly 30 years, Bayer has been actively involved in finding solutions to the problems affecting pollinators. Bayer is an industry leader in the areas of bee health research, education, collaboration and stewardship. Some of our activities include:

- Established the North American Bee Care Center, a $2.5 million, 6,000 square-foot facility dedicated to bee health research, education and collaboration, as well as three field research technology stations strategically located throughout North America
- Evaluating new non-invasive technologies known as *Smart Hives* to track changes in honey bee colony health in and help provide information to improve hive management
- Screening and developing new products to help control major pests of bees, including new delivery systems to prevent colony re-infestation by the parasitic Varroa mite
- Leading the agricultural industry in efforts to implement best management practices to minimize potential exposures to pollinators, working with farmers and beekeepers
- Launched "Feed a Bee," a major initiative involving more than 250,000 consumers and 70 organizations to help increase forage options for

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pollinators, resulting in 65 million flowers planted and thousands of new habitat acres pledged in 2015 alone

Because the focus of H539 (as proposed) is on neonicotinoid insecticides, it is important to note that these products are widely used to protect our crops, homes, recreational spaces and even our pets from destructive pests. Neonicotinoids are critical to modern integrated pest management programs, significantly increase crop yields, and add billions of dollars to the U.S. economy, benefiting both not only farmers but entire communities. With hundreds of studies conducted, we know more about neonicotinoids and pollinators than any other pesticide and the science tells us that these products are not responsible for bee decline. The loss of these important products would only hurt farmers and would not help bees.

Once again, we thank you for allowing us the opportunity to provide this information. Should you have any questions or would like additional information, please do not hesitate to ask.

Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Sincerely,

Iain D. Kelly, PhD
Director, Regulatory Policy and Issues Management