Responsible Industry for a Sound Environment®

February 15, 2018

Representative Carolyn W. Partridge, Chair
Representative Richard Lawrence, Vice Chair
Members of the House Agriculture and Forestry Committee

Room 31
115 State Street
Montpelier, VT 05633-5301

RE: H. 688, An act relating to pollinator protection

Dear Representative Partridge, Representative Lawrence, and Members of the Agriculture and Forestry Committee

Thank you for the opportunity to submit testimony on H. 688, relating to pollinator protection.

RISE (Responsible Industry for a Sound Environment) is the national trade association representing manufacturers, formulators, distributors and other industry leaders engaged with specialty pesticides used by both consumers and professionals. We recognize the vital role pollinators play in the environment and plants we grow. The health of pollinators is of paramount importance to everyone, and we support initiatives to promote pollinator health and believe its complexity calls for thoughtful and stakeholder engaged solutions. That is why we are committed to working with states and stakeholders to assist in pollinator health and stewardship efforts and the development of voluntary state managed pollinator protection plans (MP3).

We believe collaborative and science-based efforts are the best way to achieve the shared goal of stewardship and protecting the long-term health of pollinators. We continue to participate in pollinator protection plan discussions and workgroups seeking to develop state MP3s. We believe that voluntary MP3 plans will work to address and support overall pollinator health along with creation of habitat and nectar-rich forage.

H. 688 jumps straight to conclusions about pollinator health in Vermont without clear data, allowing for mitigation efforts, or for development of a stakeholder-engaged MP3. Comprehensive reports by U.S. Department of Agriculture (USDA) and the USDA National Agricultural Statistics Service (NASS) describe a broad range of issues or “stressors” negatively affecting bees, including habitat loss, parasites and diseases, lack of genetic diversity, climate change, pesticides, reduced forage options and pathogens. The overwhelming consensus of these

reports is that the greatest single factor impacting bee health is the Varroa mite.[1] Not only is Varroa Mite recognized nationally as the leading stressor, but the highest number of reported Vermont colony losses in 2017 resulted from Varroa Mite infestations.

Neonicotinoids are important public health tools used to protect people, pets and our, environment, including high value trees. Neonicotinoid-based products are used by professionals and consumers to control harmful and disease carrying insects such as bedbugs, termites, fleas and ticks found in private and public homes and housing, hotels, public parks and green spaces throughout Vermont. According to Vermont Department of Health, "Vermont had the second highest rate of reported Lyme disease cases in the U.S.[2]" Neonicotinoids are important tools in protecting against ticks, and given their favorable mammalian health and safety profile, are the primary tools to defend against tickborne diseases for people and pets. For example, imidacloprid is widely used on cats and dogs to control fleas and ticks in the form of drops applied directly to the neck and skin of the animals.

Neonicotinoids are also important tree care products, protecting high value trees in communities from devastating invasive insects such as the Emerald Ashe Borer, Hemlock Woolly Adelgid, and the Spotted Lanternfly, which is an emerging insect threat in the Northeast. They are essential tools in integrated pest management (IPM), a rigorous process used by applicators to successfully manage pests by identifying the pest problem, establishing treatment thresholds and the best treatment options for the situation. IPM is an effective and globally recognized program to achieve balance between effective pest control and pollinator health, and is defined as "a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks." Vermont recognizes this rigorous pest management technique through the work of The University of Vermont's IPM Program.[3]

Neonicotinoids represent one of the most significant advances in insecticide technology in recent years and are among the safest pesticides for consumers, professionals, and the environment. As with all pesticides, neonicotinoid products undergo rigorous review and evaluation when registered with the U.S. Environmental Protection Agency (EPA). The EPA has registered neonicotinoid insecticides under their Reduced Risk Program due to their favorable environmental profile and low risk to human health. In 2013, the EPA made labeling changes to neonicotinoids labeled for outdoor foliar use to minimize exposure to pollinators. The label changes included a "Pollinator Protection Box," as well as new pollinator language to the Directions for Use section of each label. These label terms highlight measures to better protect pollinators.[4]

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[1] U.S. Department of Agriculture, Honey Bee Colonies (August 2017), ISSN: 2470-993X, http://usda.mannlib.cornell.edu/usda/current/BeeColonies/BeeColonies-08-01-2017.pdf

[2] Vermont Department of Health, Tickborne Diseases, Lyme Disease, http://www.healthvermont.gov/disease-control/tickborne-diseases/lyme-disease

[3] The University of Vermont, Vermont IPM, http://pss.uvm.edu/EIPM/

[4] U.S. Environmental Protection Agency, Pollinator Protection, New Labeling for Neonicotinoid Pesticides, https://www.epa.gov/pollinator-protection/new-labeling-neonicotinoid-pesticides

Vermont Agency of Agriculture, Food & Markets already has a strong registration and regulation process in place for pesticides that ensures products are used safely when used according to label directions. Banning the use of neonicotinoids would not have a meaningful impact on pollinator health and would eliminate necessary and effective tools for consumers and professionals to manage and treat harmful and public health pests and invasive insects that can threaten people, pets, shrubs, trees and other plants, as well as the nursery and greenhouse crops that are grown and sold in Vermont. By design, prohibitions do not create a way for stakeholders to discuss and collaborate on truly meaningful ways to benefit bee health, habitat and forage. Instead, we believe meaningful and productive stewardship initiatives, pollinator plans and programs through state and stakeholder partnerships are a path to enhancing pollinator health.

To make a difference for bee health and sustainability, we urge you to consider:

- Developing a managed pollinator protection plan (MP3) that includes Best Management Practices (BMPs) such as those developed collaboratively by a multi-stakeholder group at: https://ncipmc.org/action/bmpturf.pdf.
- Educational outreach encouraging pollinator-friendly plantings on private and public lands.
- Maintaining an accurate registry of managed honey bee hives and apiary locations.
- Supporting communication and community-focused educational outreach to residents, businesses and local government about best management practices, and growing and planting a stable plant community of nectar-rich and bee-attractive plants.

Thank you for the opportunity to comment on this matter as the Committee considers pollinator health in Vermont. If it would be helpful, we can provide expertise on this topic as well as more detail about the most current pollinator research.

Please contact me if you have questions about these comments or our industry efforts.

Sincerely,

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