



February 28, 2019

Members of the Senate Committee on Finance
Committee Room 6
115 State Street
Montpelier, VT

RE: **HB 205- An act relating to the regulation of neonicotinoid pesticides**

Chair Cummings, Vice-Chair MacDonald, and distinguished members of the Senate Committee on Finance:

Thank you for the opportunity to submit written testimony about **HB 205**, which would designate neonicotinoids as a restricted use pesticide in Vermont, increases pesticide registrations to \$200, and creates additional certification and requirement for beekeepers. We respectfully submit this opposition testimony and **request an unfavorable vote.**

We believe education, effective management of honey bee diseases and creating abundant and reliable forage are the best ways to promote pollinator health and wellbeing. Many different factors affect pollinators, including pests and parasites, microbial diseases, insufficient nutrition, bee management practices, habitat loss and climate change. As written, **HB 205** takes a non-scientific approach to a very complex scientific issue by focusing primarily on insecticide use.

We believe everyone can agree protecting the health of the honey bees that pollinate our crops is important. Further, everyone can agree science-based approaches are the best way to support honey bee health because they provide meaningful and measurable outcomes. Reading and following all pesticide label instructions is another way people can ensure they are protecting pollinators while managing harmful outdoor pests.

Insecticide Benefits

Neonicotinoids have been used for more than 20 years to protect trees from damaging insects such as the emerald ash borer, to protect homes from termite infestations, and to control fleas on pets. Because of their favorable environmental profile, they are important products in integrated pest management and to manage insect resistance in rotation with other insecticides.

Integrated Pest Management (IPM) is an effective and state 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.

Neonicotinoid-based products are used by professionals and consumers to control harmful and disease carrying insects such as ticks, which are 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.” 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.

We urge you to consider the complexity of the pollinator health issue, both for managed honey bees under contract crop pollination and honey production, and for other pollinators impacted by decreasing habitat and forage in the landscape. The restrictive focus of **HB 205** does not provide for meaningful or measurable solutions and if passed would result in significantly fewer options available to consumers for managing destructive pests such as emerald ash borer with little if any benefit to bee populations.

Honey Bee Health

Experts agree, one of the most significant threats to honey bees is the Varroa Mite. This mite is an external parasite that attacks both adults and young honey bees. Varroa Mites weaken bees and transmit deadly viruses while they feed. Untreated or unmonitored, Varroa Mites can cause honey bees to abscond from their hives or cause colony death. The National Stakeholders Conference on Bee Health held in 2013 found the Varroa Mite remains “the single most detrimental pest of honey bees.”

Colony collapse disorder has been another significant issue in managed honey bee colonies used in contract crop pollination. This is not a new issue and considerable resources at the federal and state levels is allocated to address this problem with positive results during the last decade. Colony collapse disorder is not an issue for the wild and native bees found in neighborhood landscapes or urban areas.

In May 2014, the U.S. Department of Agriculture and United States Environmental Protection Agency released a comprehensive scientific report on honey bee health. The report concludes there are multiple factors that play a role in honey bee colony declines. The report:

- Found the Varroa Mite is the “single most detrimental pest of honey bees and is closely associated with overwintering colony decline”
- Notes multiple diseases associated with colony collapse disorder, many of which are amplified by the Varroa Mite
- Recommends increased nutritional options (forage) to lessen susceptibility to stressors

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. Nutrition continues to have a major impact on individual bee and colony longevity. Bees not receiving enough nutrients appear to be easier targets for pathogens, parasites and other stressors. One solution is creating diversity in the landscape surrounding colonies, offering more nutritional resources to honey bees and other pollinators.

Regulation

The neonicotinoid pesticides cited in **HB 205** are registered through the U.S. EPA's Reduced Risk Program, which is designed for products that pose less risk to human health and the environment. U.S. EPA rigorously reviews all pesticide products scientific health and safety data, to ensure the product can be used safely. All products must meet the high standard of "having no unreasonable adverse effects on health or the environment." Once U.S. EPA reviews and registers a pesticide it continues to study and evaluate its safety and effect on people and the environment to ensure it meets the most current scientific and safety standards. The neonicotinoids are currently undergoing such a review.

Both U.S. EPA and the state's Public Health and Agricultural Resource Management Division have regulatory authority to change the availability and use status of any pesticide product at any time for a range of safety and scientific reasons. These regulatory processes and options should not be superseded by the prohibitions described in **HB 205**.

In the interest of public health, pollinator health, environmental protection, and keeping with established IPM guidelines we again ask for **an unfavorable vote on HB 205**.

Sincerely,

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RISE (Responsible Industry for a Sound Environment) is the national association representing manufacturers, formulators, and distributors and other industry leaders engaged with specialty pesticides. We support and promote science