



EPA Activities to Protect Pollinators

American Seed Trade Association (ASTA) - Seed Treatment and Environment Committee

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Agenda

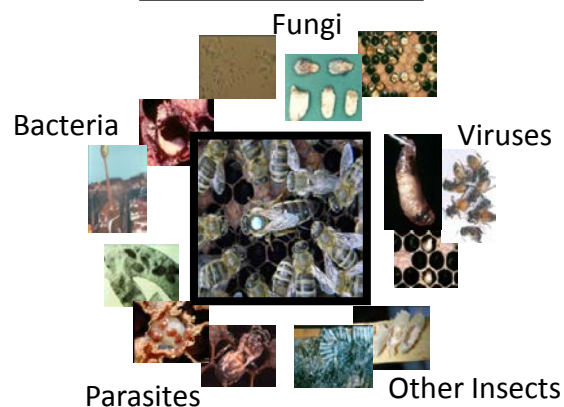
- Summary of Pollinator Protection Strategy
 - Goals
 - Strategy
 - EPA Activities
- Seed-Related Activities
 - Interim Registration Position - Neonics
 - Soybean Seed Treatment Benefits Analysis
 - Treated Seeds / Lubricants
- Next Steps/Public Involvement



Factors Associated with Bee Declines

- USDA has identified multiple factors; no single factor identified as “cause”.

Disease/Parasites



Agricultural Practices

Urbanization



Bee Management Practices



Source: USDA Agricultural Research Service

Pesticides



Nutrition

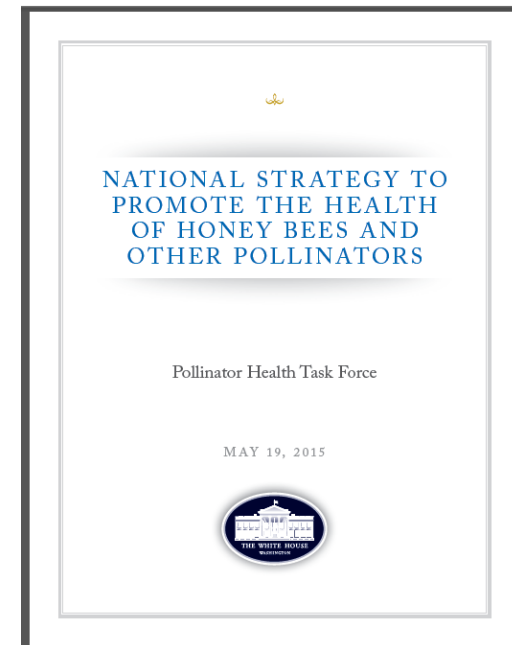




White House Announces a National Strategy to Promote Pollinator Health For Release: May 19, 2015

On Tuesday, May 19, the White House announced the National Strategy to Promote Pollinator Health. The strategy released today and its accompanying Pollinator Research Action Plan outline needs and priority actions to better understand pollinator losses, improve pollinator health, and to enhance pollinator habitat.

(<https://www.whitehouse.gov/sites/default/files/microsites/ostp/Pollinator%20Health%20Strategy%202015.pdf>)





Overarching Goals of the Pollinator Strategy:

- The strategy's broad-reaching goals are to:
 - Restore colony health to sustainable levels by 2025.
 - Increase Eastern monarch butterfly populations to 225 million butterflies by year 2020.
 - Restore or enhance seven million acres of land for pollinators over the next five years.



The Strategy

- Pollinator Research Action Plan;
- Plans for expanding education and outreach;
- Opportunities for public-private partnerships;
- Improving pollinator habitat.



Photographer: Eric Vance



High-Level EPA Assignments to Advance Pollinator Strategy

Including:

- Tiered guidance for assessing the risk posed by pesticides to bees was completed in 2014 (in collaboration with Canada Pest Management Regulatory Agency (PMRA) and California Department of Pesticide Regulation (DPR)).
- Complete all honey bee exposure and effect protocols and implement the harmonized pollinator risk assessment process by the end of 2016.
- Achieve conformance with the 2015-2017 re-evaluation schedule of the nitroguanidine-substituted neonicotinoid subclass to satisfy the standard for registration under FIFRA.
- Finalize benefits assessments for imidacloprid and thiamethoxam soybean seed treatments by fall 2015.
- Issue for public comment a draft framework outlining an approach to protect monarch butterflies that balances monarch protection and weed management by summer 2015.
- Bee mortality incident guidance was issued May 9, 2013; EPA will report annually on the number of reported mortality incidents, cumulative hive mortality, and results of inspections.



Protecting Pollinators From Exposure to Pesticides

EPA Activities:

- Science
 - EPA is committed to using best available science to support pesticide decisions using a harmonized risk assessment framework.
- Regulatory Decisions / Risk Mitigation
 - Assessing risks of pesticides including neonics- accelerating the schedule for re-evaluation of neonics.
- Partner with Stakeholders Nationally and Internationally to Advance Issue



Photo courtesy of Sam Droege, USGS



Improving the Science:

- Current information focuses on acute contact and exposure.
- New approach brings in information on impact to larvae, chronic exposures and colony-level impacts.



Interim Position on New Outdoor Neonicotinoid Registrations

- Letters sent April 2, 2015 to registrants of neonicotinoid pesticides with new pending outdoor uses
 - EPA will likely not be in a position to approve new uses of these chemicals until new bee data are submitted and pollinator risk assessments are complete.
- Position permits EPA to focus on moving forward with Registration Review for Neonicotinoid class of chemicals
- Activity coordinated with Canada's Pesticide Management Regulatory Agency (PMRA)
- Interim Position – Next Step: Development of risk assessments



Proposal to Mitigate Acute Risk to Bees

- Proposal was released for public comment on May 29, 2015
(<http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPP-2014-0818>)
- Addresses acute contact exposure to foliar pesticide applications
- Label Restrictions for Contract Pollination Services
- Comment period closes July 29, 2015





Proposed Label Restrictions

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

FOR FOLIAR APPLICATIONS OF THIS PRODUCT TO SITES WITH BEES ON-SITE FOR COMMERCIAL POLLINATION SERVICES: Foliar application of this product is prohibited from onset of flowering until flowering is complete when bees are on-site under contract, unless the application is made in association with a government-declared public health response. If site-specific pollinator protection/pre-bloom restrictions exist, then those restrictions must also be followed.



State and Tribal Managed Pollinator Protection Plans (MP3s)

- Several states have been working through this issue at the state level and developing state pollinator protection plans
 - Voluntary: California, Colorado, Florida, North Dakota, Mississippi
 - Regulatory: California, Iowa
 - About 25 other states have begun the stakeholder process
- MP3s serve as examples of effective communication and collaboration between stakeholders at the local level
- SFIREG has issued guidance for states on the development of plans



Benefits of Neonicotinoid Seed Treatments to Soybean Production

- EPA conducted a benefits analysis of imidacloprid, clothianidin, and thiamethoxam seed treatments for insect control in United States soybean production.
- Findings:
 - Nationally, on average, U.S. soybean growers derive limited to no benefit from neonicotinoid seed treatments in most instances.
 - Some of the observed use is preventative and may not be providing any actual pest management benefits.
 - Often, foliar applications of broad spectrum insecticides are subsequently needed, due to very short early-season period of bioactivity of seed treatment.
- The analysis was released for public comment between October 2014 and January 2015.
 - EPA is reviewing the comments and analyzing additional information relevant to the assessment.
- EPA will conduct additional benefits assessments of the neonicotinoids as part of the registration review process.



Seed treatment - Lubricant

- **Reduce exposures during the planting of pesticide-treated seed:**
 - Bee kills have been reported from the drift of contaminated dust during the planting of pesticide-coated seed.
 - Predominantly from abrasion of the seed coating from using precision pneumatic equipment
 - Stakeholder engagement:
 - Issuing guidance on seed treatment stewardship (ASTA 2013), along with efforts to
 - Develop lubricant agents that can reduce dust generation during the planting of treated seed
 - EPA has been working with the ASTA, equipment manufacturers, and pesticide registrants to explore additional mitigation measures, including broader adoption of best management practices, to further reduce the emissions of these pesticide residues during the planting process.
 - Leading to the development of alternative lubricants to reduce the extent of fugitive dust
 - Development of more effective seed coatings to enhance the extent to which pesticides adhere to seeds.
 - OPP and ORD have been collaborating with USDA ARS, PMRA and Ohio State University (Land Grant) on an EPA Region 5 (RARE Grant) funded study examining factors associated with incidents linked with the planting of treated corn seed and this research is helping to validate the USDA VarroaPop model for which EFED has recently developed a pesticide module.
 - OPP has been working with PMRA on their seed treatment standards.





Next Steps

- Provide Comments on Proposal to Mitigate Acute Risk to Pollinators.
 - Comment period closes July 29, 2015
(<http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPP-2014-0818>)
- June 23, 2015 (3:00 – 4:30 pm (ET)): Public webinar about plan to prohibit the use of all highly toxic pesticides when crops are in bloom and bees are present under contract for pollination services.
 - <https://epa.connectsolutions.com/pollinatorproposal/>.
- Work with states and tribes on MP3s and best management practices
- Provide educational outreach on reduction of dust-off
- Dust-off issues addressed in State and Tribal plans.
- Look for opportunities in public-private sector partnership arena.



QUESTIONS?

