

US EPA ARCHIVE DOCUMENT

# PPDC Workgroup on Pollinator Protection



December 5, 2013

## Outline

- **EPA Report Out/Update**
- **Workgroup Report Out/Update**
- **Next Steps for the Workgroup**

# PPDC Workgroup on Pollinator Protection



## **EPA Update**

**Workgroup recommendations put into action**

### **Current Workgroup Focus Areas:**

➤ Labeling, Best Management Practices (BMPs),  
Communication and Education/Training and Enforcement

**Planning Future Activity for the Workgroup  
following PPDC input**

# PPDC Workgroup on Pollinator Protection



## EPA Update

**Workgroup recommendations put into action  
LABELING**

✓ **PPDC recommended labels be harmonized and protective language be clearer.**

- EPA strengthened neonicotinoid labeling language to address acute toxicity to bees.
  - More restrictive language retained while pollinator protection box and additional directions for use added.

# PPDC Workgroup on Pollinator Protection



## **EPA Report Out/Update**

### **Workgroup recommendations put into action LABELING**

- ✓ PPDC recommended that RT25 (time required to reduce residual toxicity to 25% of the test organisms) data may be a useful tool to potentially mitigate exposure.
  - EPA has compiled all existing residual toxicity data submitted to the Agency in a database
  - EPA intends to make this data available on its website in time for the 2014 growing season.

# PPDC Workgroup on Pollinator Protection



## **EPA Report Out/Update**

**Workgroup recommendations put into action  
BMPs**

- ✓ **PPDC recommended more research on BMPs and a centralized location on the web for existing BMPs.**
  - EPA and USDA with the IPM Centers are developing a Pollinator-Crop Production BMP website.

# PPDC Workgroup on Pollinator Protection



## **EPA Report Out/Update**

**Workgroup recommendations put into action**

### **COMMUNICATION/EDUCATION**

- ✓ **Compiling pollinator awareness applicator training modules and materials**
- ✓ **This subgroup and the BMP subgroup have joined forces and succeeded in making BMPs available to the public through various websites**

# PPDC Workgroup on Pollinator Protection



## **EPA Report Out/Update**

### **Workgroup recommendations put into action ENFORCEMENT**

- ✓ PPDC recommended more uniformed and transparent bee kill investigations
  - EPA Region 5 developed bee kill investigation guidance working collaboratively with EPA HQ, states and beekeepers.



# PPDC Workgroup on Pollinator Protection



## Workgroup Report Out/Update Workgroup Recommendations

- ✓ LABELING
- ✓ BMPS+COMMUNICATION/EDUCATION
- ✓ ENFORCEMENT

# Labeling Subgroup



**Work group has been addressing label language first proposed in a 2000 draft PRN :**

**“This product is toxic to bees exposed to treatment and for  $x$  hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of the plants if bees may forage on the plants during this time period”.**

## What is “Bloom”?

- **Beekeepers**: Anytime a flower is open to bees for pollen and nectar.
- **Geography, topography, weather affect bloom timing** – bloom times for the same crop can vary between regions within a state.
- **In CA Citrus, defined as 10% -90% of orchard in bloom; determined by stakeholders including growers, beekeepers, pesticide applicators and the CAC in the citrus district of where the groves are located**
- **Concerns:**
  - **Crops with different cultivars planted together or in close proximity that bloom at different times**
  - **Weed bloom**
  - **Extended Bloom: tomatoes, cucurbits, etc.**
  - **Extra-floral nectaries – NOT a flower; require different language on a pesticide label – cotton has season-long “nectar-producing parts of plants”**
  - **Beekeepers: Pesticide notification rarely results in bee hive movement - is a means of opening the line of communication between the beekeeper and pesticide applicator**
  - **Growers: want balanced approach that enables the producer to protect his crop/economic livelihood, while not creating undue stress on managed bees**
  - **SLA’S: a label needs a stated, specific time period to be enforceable**

## **Issues that Need to be Addressed for Using “Bloom” as a Reference on a Pesticide Label**

- 1) Any prohibition time (time before bloom during which a product cannot be used) must be based on a robust risk assessment for an active ingredient.**
- 2) Need additional discussions regarding crops (e.g., cotton, tomato) that have nectar-producing parts, pollen shedding, or are indeterminate bloomers**
- 3) Need broader discussions with SLA’s regarding the enforceability of using “bloom” in label language**
- 4) Need to further discuss looking at the CA Citrus program as a model for other crops, i.e., mechanisms and processes that would allow for authoritative, local level implementation of the term “bloom”**
  - Allows flexibility - specific to a commodity for a specific region**
  - This type of flexibility does not seem possible at the level of the federal label**
  - Currently no state program which ensures that managed bees will not be present in any treatment area**

**Proposal to PPDC is that use of “bloom” on a pesticide label may work, however the Labeling Subgroup needs to address several issues related to the use of the term “bloom” in order to preserve local flexibility while providing enforceable protection for pollinators.**

# Training/Education Subgroup

## Pesticide Environmental Stewardship

Promoting Proper Pesticide Use and Handling

Supported by CIPM  
Center for Integrated Pest Management



Home Topics Sponsors and Partners Resources Terms/Activities Ask a Question

Home  
How To Read the Label  
Calibration  
Disposal  
Drift  
Handling Containers  
Homeowner  
IPM  
Organic Production  
Personal Protective Equipment  
Pollinator Protection  
Recordkeeping  
Resistance  
Soil Fumigation  
Spills  
Storage  
Surface and groundwater  
Transportation  
Wildlife Protection  
Worker Protection Standard



The Pesticide Environmental Stewardship (PES) Website is sponsored by the Center for Integrated Pest Management. PES provides convenient access to information on proper pesticide handling. All subject matter content on this site has been reviewed and posted by Pesticide Safety Education Program coordinators from the Cooperative Extension Service. This website is intended for a national audience with links to state-specific information, where available. Crop producers, pesticide dealers, commercial/professional applicators and the general public will benefit from the information presented in each topic, or module. **Pesticide educators are welcome to use or adapt the content that appears directly on the PES website. Images may be subject to copyright.**

Topic titles are listed in the sidebar on the left. "Click" on the topic title to view the introduction. Upon landing on the introductory page, a list of subtopics will appear below the topic title.

Resources to download and print - brochures, documents etc.

Acknowledgments : the creators and contributors to this website

PES content NEVER supersedes information on the pesticide label or in all applicable regulations. Always read and follow label directions before buying or using a pesticide. Follow all appropriate federal, state, tribal, and local regulations.

Disclaimer: Use and/or adaptation of the content on this site or from links listed on this site are the sole responsibility of the user. PES content is subject to change at any time, and may not always be up-to-date. Mention of brand names is for educational purposes only.

eXtension  
Latest :  
pesticidestewardship

What is pesticide drift?

What are pesticide signal words?

What is a pesticide?

How can farmers, gardeners and applicators reduce risks of honey bee injury from pesticide applications?

More...

Create your own eXtension widget



## Certification/Education/Training Group

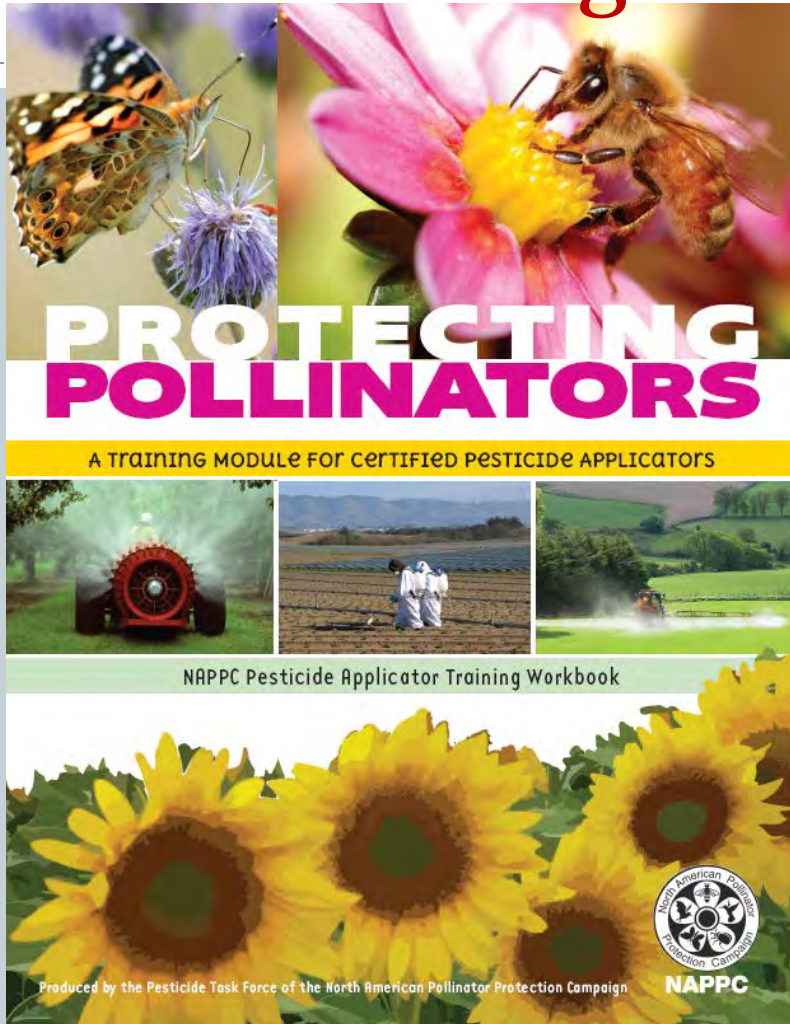
Identified the need for central location for information to protect bees. BMP's are central component of communications to protect bees.

The Pesticide Environmental Stewardship Website(<http://pesticidestewardship.org>):

Covers 17 stewardship topics  
Compiled by Pesticide Safety Educators

Target audience: users, dealers, educators, homeowners  
eXtension Community of Practice

# Training/Education Subgroup



## Certification/Education/Training

Looking toward working on the NAPPC  
Training Module

A training module for:  
**Certified Pesticide Applicators,  
Crop Advisors  
Agricultural Producers**

# PPDC Workgroup on Pollinator Protection



## Workgroup Future Next steps

- ✓ **Other Advice to the Agency?**
  - Additional Label Terms
  - Better data sharing with states on incident reporting
- ✓ **PPDC Recommendations for the Workgroup**
- ✓ **Continue with the Exchange or Refocus?**
  - Standing monthly call/webinar for stakeholder idea exchange?

# PPDC Workgroup on Pollinator Protection



## **Workgroup Future**

- More discussion needed on:
  - The term “Bloom” and options for enforceable label language defining bloom
  - Language to accompany the web-posting of the RT25 data to help users characterize, interpret and use the RT25 data.



# Images from the New EPA Pollinator Website (in development/coming soon)



## Pollinator Health Concerns



## Working with Our Partners



## Protecting Pollinator Health

## Report Bee Kills



## Pollinator Science



# Additional Slides



## Optional Slides Follow:

- ❖ **Workgroup Accomplishments**
- ❖ **Example of one possible way to present RT25 data**
- ❖ **December 2012 PPDC Charge to Workgroup**
- ❖ **Additional Information**

# Pollinator Protection Work Group Labeling



## Accomplishments of the Labeling Subgroup

### “Foraging” vs. “Visiting”

- Currently, EPA labels interchange the terms “foraging” and “visiting”
- Workgroup recommends to the PPDC that the term “foraging” be used on all labels (remove ‘visiting’).
- Workgroup believes that the term “foraging” more accurately describes the activity of the bee in or around a food source or a treatment area.

### RT<sub>25</sub>

- Reached consensus on the potential for the RT25 data in developing BMP
- Also agreed about the limitations of the RT25 data

# Pollinator Protection Work Group Labeling



## RT<sub>25</sub> Data

- Available only for some pesticides
- Important Limitations

Chemical	Formulation / Product Name	Application Rate	Crop	RT Value (hours)	Test Species	Taxonomic Group
Active Ingredient	Product Name	0.5 lb./A	Alfalfa	16	Honey bee	Apis mellifera
Active Ingredient	Product Name	o.5 lb./A	Alfalfa	19	Alkali bee	Nomia melanderi

# Pollinator Protection Work Group Labeling



- Going forward, risk assessment and risk management will be based on a more comprehensive risk assessment process that serves to strengthen the underlying science. Reducing risk can include a range of actions including clear enforceable language, use of BMPs, including risk communication.
- The workgroup acknowledges that not all labels can be “fixed” at once, providing guidance on the meaning of terms, or intent of terms on existing labels would help the stakeholder community.
  - Visiting = foraging
  - Use of the terms “foraging” vs. “actively foraging” are trigger terms that data is available to characterize the potential residual toxicity of a product
  - BMP’s, including the availability of an RT25 data base should be part of an effort to clarify existing labels and reducing risk to pollinators.
- AAPCO and SFIREG should be included in any effort to draft guidance on terms for existing labels.

# Pollinator Protection Work Group

## BMP and Communication



- November 2012 PPDC Charge:
  - **Determine an appropriate website, and begin to collate available BMP information, including RT25 data, to populate a website.**
  - **Work with USDA to determine a point of contact for BMPs**
- Pollinator Protection Module of the Pesticide Stewardship.org website was created to capture and disseminate information and education material for applicators and growers while serving as a resource for trainers. It can be considered as a work in progress, and can be suited to also serve as a source of BMP's for pollinators.
- EPA and USDA have begun to discuss centralizing pollinator BMPs on USDA websites, *e.g.*, IPM Center websites.
- A USDA BMP Portal needs to be linked to State's Agricultural Extension Agents.

# Pollinator Protection Work Group

## Enforcement



- On May 29, EPA (OECA) made available its Guidance for Bee Kill Investigation.  
<http://www.epa.gov/compliance/resources/policies/monitoring/fifra/bee-inspection-guide.pdf>
- Enforcement Subgroup has provided OPP with comments on the *Investigation Guidance* and on the “*How to Report an Incident*” document.
- As a follow-up to the *Investigation Guidance*, Region 5 will rely on SFIREG and AAPCO for information on how to investigate an incident.