

US EPA ARCHIVE DOCUMENT

# CropLife America's Comments on the PPDC Pollinator Protection Proposal

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# Current Status

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- For many years, label language has been used to mitigate potential risks to pollinators, based on risk assessments. CLA continues to work at the State, Federal, and International levels to support pollinator protection, including:
  - SETAC Pellston Workshop on Estimating the Risk of Pesticides to Pollinators
    - ❖ Will form the basis of EPA's proposal for risk assessment process
    - ❖ Executive summary Spring 2011/ Final Publication Early 2012
  - NAPPC (North American Pollinator Protection Campaign)
    - ❖ Protecting Pollinators brochures for agriculture and consumers
    - ❖ Training for applicators initiative
  - CURES (Coalition for Urban/Rural Environmental Stewardship)
    - ❖ Pollinators and Pesticide Stewardship brochure

# Goals for Pollinator Protection

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## Pollinator protection should be achieved by:

- A robust science-based risk assessment process to determine the potential risks posed by pesticides;
- Adoption of the science into a regulatory testing framework;
- Consistent label language that is appropriate to the crop, application method, specific pest problems, and pesticide product, based on the results of risk assessment;
- Robust and coordinated stewardship of pesticide products, crops, and managed pollinator populations;
- Applicator training and education of growers to ensure use of best management practices.

# Role of the PPDC in Pollinator Protection

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- CLA supports the role for a PPDC work group on pollinator protection.
  - Protecting pollinators while ensuring effective agricultural production needs the input of the multiple stakeholders represented by the PPDC.
  - The PPDC provides an excellent forum for information to flow from the scientific community out to a much broader stakeholder audience.
- The scope of the initiative should be clearly defined so that duplication with other groups is minimized.
  - An inventory of ongoing federal, state, academic, and non-governmental forums, programs, and practices addressing pollinator protection and health would help ensure this.

# Points to Consider

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- OPP has acknowledged the many-faceted components involved in bee health and decline; indeed, this is fundamental to ensuring that optimal solutions are found.
- Efficient agriculture, which is dependent on good crop protection, allows for setting aside more marginal land to provide habitat for native pollinators, rather than forcing it into crop production.
- The PPDC group should ensure that pollinator protection activities of USDA, other federal agencies, and states are considered.