US ERA ARCHIVE DOCUMENT

# **Pollinators**A

## National Resource Priority Issue



# Bee Industry Concerns

- Pollinator Health
- Risk Assessment Process
- Risk Management

- Pollinator health (update of the science)
  - o Status of commercially managed honeybees
  - · pesticides/nutrition/Disease(striking a balance)
  - o Non-Apis bees
- Risk Assessment (state of the science)
- o How risk assessment methods are evolving
  - SETAC Pellston
  - Sub lethal effects
  - (There is concern that certain products can act as bio enhancers which enable certain bee diseases to manifest themselves to a greater extent than would be otherwise. Certainly queen drone, brood damage, decreased learning ability, and other is sues are concems as well.)
  - Evaluating contact versus systemic pesticides
  - (Products applied through chemigation or any technology through which pesticides can contaminate pollen or nectar are also a concern.)
  - Potential time lines (short-term, intermediate, long-term)
  - · Alternatives to registrant-submitted studies
  - (Acceptable USDA, University, or private researcher's studies using appropriate technologies for accurate testing can be of great benefit in addition to registrant submitted studies. Using a sufficient number of colonies is an important component of any study.)
  - Formulated product testing including inerts
  - Multiple castes
  - Tiered testing
  - Evaluating fungicide's sub lethal and antimicrobial effects (Including effects on microbes necessary for the conversion of pollen

  - Individual actives versus multiple actives in a formulation
- Screening-level verses refined assessments
- Risk Management
  - o Labellanguage
    - "ambiguous and unenforceable?" States are asking for clarification from
    - . Bee hazard for all pollinator toxic pesticides and application technologies
    - (Including fungicides which have adverse effects on bee colonies)
    - Clarity of mandatory and advisory language
    - Concerns about certain fungicides having known negative synergistic effects when applied in combination with other products.

### Applicator education

Require Pollinator protection education

Enhancement of National Spray Applicators Core Training Manual in order to be consistent in terms and practices

- How mitigation measures have evolved
- Concern about environmental mixtures resulting from crop rotation and previous pesticideapplications.
- Habitat modification
  - Reestablishing and renewing pollinator habitat
  - (Needed due to herbicide and pesticide applications and other changes in farming practices)
  - Protection of beneficial plants such as legumes' and pollinator friendly trees/shrubs
    - Vegetative buffers Alternative habitats
- o Spray drift language (update)
- Import tolerances for honey Weighing risks versus benefits
- Grower/Applicator/Pollinator Interactions (including native pollinators)
  - o What constitutes the middle ground?

(Sustained native pollinator populations)

## Risk Management

- Label Language
- Applicator Education
- Tank Mixing
- Soil Residuals
- Habitat Modification
- Spray Drift
- State Enforcement