

SFIREG Issue Paper: Pollinator Stewardship Community and Illegal Pesticide Use and Distribution

Background

The emergence of Colony Collapse Disorder (CCD) and an increased awareness and documentation of over-wintering losses came to the forefront of public attention between 2006 and 2014. Since then State Lead Agencies (SLAs) have been increasingly involved in numerous pollinator health, pollinator protection, and pollinator habitat initiatives. As shown in the AAPCO's National Assessment of Managed Pollinator Plans (MP3), nearly 90% of all States are involved in improving pollinator health in various ways. The 2019 survey results can be found at: <https://aapco.files.wordpress.com/2019/12/mp3-assessment-dec-2019.pdf>. It is anticipated that states, territories, and tribes will be surveyed again in fall of 2021.

SLAs have accomplished many goals in the effort to promote pollinator health and protection. SLAs have conducted outreach across the nation to increase awareness of the important role pollinators play in our agricultural economy and the environment that the pollinators serve. We have sponsored meetings and conducted recertification classes that address pollinator protection for the agricultural community. We have invested money in mapping programs that facilitate applicator awareness of the "Pollinator Awareness Zone" by locating the areas managed bees occupy. We have worked with pesticide users, beekeepers, commodity commissions, universities, NGOs and other partners, to successfully promote the adopted strategies to decrease the effect of pesticides on pollinator health, and to increasing habitat for both wild and managed pollinators.

Issues Identification

Considering all the work accomplished over the last six years, there is one issue that must be brought to the forefront concerning pollinator protection and improving hive health, and that is the willful misuse of pesticides by some in the beekeeping industry. While we acknowledge that many members of the pollinator industry are vigilant in using pesticides correctly and only in a manner consistent with the labeling, there are significant portions of the industry in some areas that have seemingly adopted pesticide misuse as common practice. We are not trying to indict an entire industry as corrupt and placing managed pollinators at risk, but it is the shared experience among the states that there are many beekeepers and others within the allied industries who are actively and intentionally promoting illegal pesticide use, in an effort to control hive pests at a reduced cost.

It is sad and alarming, but this issue exists among all parties involved in managing pollinators, from manufacturers and distributors, to retail establishments and the end users of these pesticide products. There is a prominent culture of encouraged negligence in the promotion of certain products over others because they are interpreted as similar enough to products that have the correct label language but have a cheaper price tag. The mentality of, "wink wink, it is OK" and "it's the same as the other expensive stuff, just cheaper", runs rampant throughout the industry. This practice of negligence is harmful to the misinformed beekeeper, apiary inspectors who inspect hives without proper notification, and registrants that have properly formulated and labeled products. The practice also promotes resistance in the pests that are being targeted and jeopardizes the all-natural honey crop that is being produced.

Many products are misrepresented in trade magazines, over the internet, and at State and local beekeeper meetings. Some beekeeper associations allow the “misbranded” products to be prominently displayed and promoted at events, while other associations and knowledgeable State Lead Agencies have prohibited the presence of these products at beekeeper meetings. We think it is important to address this issue in order to promote consistency within the industry, and also raise awareness among regulatory agencies about the sales, distribution and use of products not labeled for use to control insect and mite pests in managed pollinators systems.

Beekeepers are adamant in their demand that all applicators in agricultural and landscape businesses strictly follow all restrictions and advisory language on pesticide labels, yet some of the most prevalent and egregious misuse of pesticide products may be taking place by some within their own industry. This misuse of pesticide products puts the beekeepers and the products that they produce at an increased risk of exposure and ultimately, can result in illegal pesticide residues in their honey, and decreased pollinator health.

Priority

It has been brought to the attention of Federal and State regulators that there is not a level playing field in pesticide enforcement concerning the agricultural industry and the beekeeper industry. It has been further stated that if this unequal playing field is not addressed by the regulatory community, growers will bring this issue to the attention of the public, causing harmful media attention to the bee industry. In addition, if growers know of illegal use by beekeepers, it serves as a disincentive to sincerely engage in a MP3. To date there has been little enforcement action taken on the use of illegal pesticides by managed beekeepers. This committee believes this issue should be viewed as high priority and in need of immediate action.

Proposed Resolutions or Remedies

In addition to encouraging continued vigilance and rigorous enforcement by SLAs against misuse, we propose the following initiatives:

Product Regulation

SFIREG urges EPA to assist them by increasing efforts to address misbranded and unregistered pesticides in the channels of trade targeted at pests of beehives, most notably varroa mites and small hive beetles. Many of these products are produced and purchased outside of a specific region and distributed nationally. With EPA’s assistance we can better address these products and issues nationwide and increase safety for applicators and the food supply.

Compliance Assistance and Outreach

We also urge the Agency to increase compliance assistance and outreach materials to address these deficient areas regarding beekeepers and the beekeeping industry. To ensure national consistency in messaging and enforcement, we believe it better addressed at a Federal level than through individual State efforts.

We also encourage States to leverage their resources by coordinating with the Apiary Services Inspection groups within their States, if available. The Apiary Inspectors Association is aware of the misuse of pesticides in the industry and are in support of increased efforts for pesticide enforcement for

beekeepers. Apiary Inspection Services would likely be willing to assist in documenting non-compliant areas within each State.

Encourage training at PIRT course in how to conduct these types of inspections and raise awareness at PREP courses regarding registration issues.

Review

We also recommend that EPA amend the FY22-25 Guidance Document to address concerns of pesticide misuse, product misbranding, unregistered product distribution, and targeted literature containing false statements that States have found to be so prevalent within the beekeeping Industry.

If you have any concerns or questions, please feel free to contact Patrick Jones at Patrick.jones@ncagr.gov .

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Patrick Jones". The signature is written in a cursive, flowing style.

J. Patrick Jones

NC Dept of Agriculture and Consumer Services