

Pollinators: The New Regulatory Framework

April 19, 2016

Florida Strawberry Growers Association -- 2016 Agritech

The Charlie Grimes Family Agricultural Center Plant City, Florida

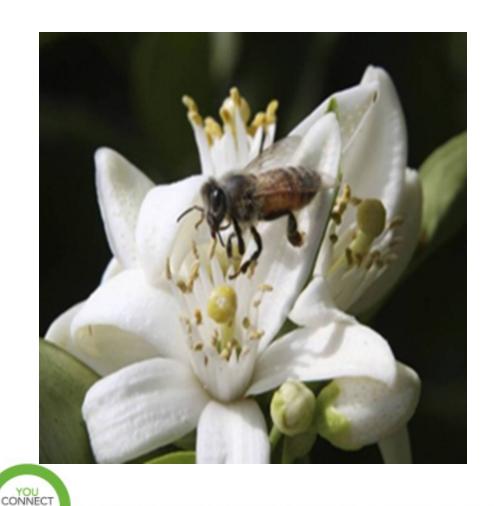




Presentation Overview

Outline

- Background
- Forcing Actions
- Federal Response
- State Managed Pollinator Protection Plans (MP3s)
- Production Impacts
- Next Steps





Background -- Pollinators and Pesticides

- Pollinator Protection Always Been Part of Registration Decision
 - Acute Toxicity to Adults and Larvae
 - Screening Level Testing
 - Management of Exposures to Less than Lethal Levels
 - Highly toxic -- Label to prevent use during period when bees are active

"Do Not Use when bees are actively foraging"





Assessment Evolution

- Emerging Issues Hive Health
 - Introduction of Varroa Mite
 - Sub-lethal, Chronic Exposures
 - "Colony Collapse Disorder"
 - Expansion of Demand for Pollination Services





Risk Assessment Shift

Population/Colony Level Impacts

- Extremely Complex
- No Specific Study Guidelines
- Diverse Opinions on Importance of Stressors
- Hard to Measure and Quantify Impacts





Forcing Actions

- No Clearly Defined Framework or Process
 - Use of Acute Thresholds
 - Questions concerning use of "Conditional Registrations"
- Beekeeper Community Struggling to Find Answers
- Serious Need for Coordinated Research Effort



International Attention

Non-Governmental Organizations

- Push to Restrict or Ban Compounds
 - Neonics
 - Seed Treatments
 - Different Guidlines



Litigation/Regulatory Interventions

- Litigation/Petitions
 - Use of Conditional Registrations

- Lack of Protection to Non-targets
- Failure to Consult on Endangered Species





Media Attention

Communication Campaign

- "Beemageddon"
- Time Magazine Cover
- Shift from Honey Bees to Other Pollinators





Federal Intervention

 "Strategy to Promote the Health of Honey Bees and Other Pollinators – May 2015"

- EPA/USDA Co-leaders, 14 Federal Departments, Agencies and Institutions
- Individual Protections Plans
- Specific Goals



Pollinator Strategy Goals

 Reduce Winter Losses of Honey Bee Hives to Less Than 15 %

 Enhance or Restore Pollinator Habitat – 7 Million Acres over Five years

 Increase Population of Eastern Monarch Butterflies to 225 Million by 2020





Federal Actions

EPA – Office Of Pesticide Programs

- Review and Revisions of Risk Assessment Guidance
- Responses to Multiple On-going Lawsuits and Petitions for Regulatory Actions
- Working within the Constraints of FIFRA
- Development of "Mitigation" to Prevent Risk

USDA

- Multiple Players
 - Agricultural Research Service & National Institute of Food and Agriculture – Research Initiative
 - Forest Service Land Use
 - Natural Resources Conservation Service Land Use, CRP





Office of Pesticide Programs

- Development of Specific Guidance for Tiered Testing of Risk to Bee
 Published in 2014
- Published "Proposal to Mitigate Exposure to Bees from Acutely Toxic Pesticide Products" May 2015
- Registration Re-evaluation Initiated Imidacloprid, Clothianidin, Thiamethoxam and Dinotefuran
- "Preliminary Pollinator Ecological Risk Assessment for Imidacloprid" December 2015



FFVA)

Office of Pesticide Programs

- Working on Label Language Site/Use Specific Risk Mitigation – "Bee Box"
- Sulfoxaflor Litigation Vacated Registration Requiring New Data
- Pending Label Expansions -- Delayed, PRIA due dates changed
- Notice of Intent to File Suit Center for Biological Diversity & American Bird Conservancy --Endangered Species – Failure to Consult -- Several New Active Ingredients





Office of Pesticide Programs

- Components of Mitigation proposals
 - Communication and coordination between Applicators and Beekeepers
 - Application timing during non-forage conditions
 - Temperature
 - Early morning, late afternoon or at night
 - Development of State or tribal Managed Pollinator
 Protection Plans

CONNEC



State Managed Pollinator Protection Plans (MP3s)

- Originally proposed in "Bee Box" language for Neonics
 - AAPCO and NASDA -- National Coordinating Groups
 - Alternative to Prohibition of Use at the Crop Site Level
 - Intended to be Crop Site Specific
 - Coordinated Development with Agreement in Concept from <u>All</u>
 Stakeholders



MP3 Goals

- Behavioral Changes Which Increase Pollinator Protection
- Reducing Exposure of Bees to Pesticides
- Improve/Maintain Pollinator Health
- Compliance with applicable pesticide labels
- National Improvement in Pollinator Health



MP³ Status in Florida

- Each State Operating with Unique Circumstances
 - Commodity Mix
 - State Regulatory Framework
 - Pesticides
 - Apiary Oversight
- Originally Developed for Citrus
- In Development for Strawberry, Blueberry and Cucurbits





Production Impacts

- Worse Case -- Loss of Key Active Ingredients or Critical Uses
- Increased Sophistication of Management Practices
- More Restrictive Labelling
- Need for Outreach and Communication





Individual Grower -- Next Steps

Determine Risk to Your Operation

- Identify Critical Production Management Tools
- Review and Understand Current Pollinator Risk Mitigation Language
- Be Prepared to Provide Benefits Information as Products Are Re-evaluated
- Know Your Neighbors (Especially Beekeepers) Proactive Communication



Collective Industry

- Development of Real World Exposure Information
- Engage with FDACS, EPA, IFAS and USDA as the National Strategy is Implemented
- Work with FDACS to Tailor the MP3 for Strawberries to Ensure Balance and Respect for Crop Production Needs
- Develop Scientifically Supported, Bee-Friendly Crop Protection Recommendations





In Conclusion:

- The sky is not falling
- Agriculture will work together to solve the problem

 This will continue to evolve as more information becomes available to more accurately determine hive level risks







