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**Re: Sulfoxaflor Bee Hazard**

Dear Directors Rodan, Handelsman, Keigwin, and Kunickis,

The Pollinator Stewardship Council is appreciative of the reduced risk of exposure to honey bees the Environmental Protection Agency (EPA) created in the new Sulfoxaflor labels by not allowing application until petal fall on bee attractive blooming crops. We are concerned, however, that the “generally required” cautionary language for pollinators in the Environmental Hazard section of the label has been omitted:

Quoting an excerpt of EPA Label Review Manual Chapter 8:

*“If a pesticide is used outdoors as a foliar application, and is toxic to pollinating insects, a “Bee Hazard” warning has generally been required to be included in the environmental Hazards. See 40 CFR § 156.85(a)... Extended Residual Toxicity (ERT)... “This product is highly toxic to bees*

*and other pollinating insects exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees or other pollinating insects are visiting the treatment area.”*

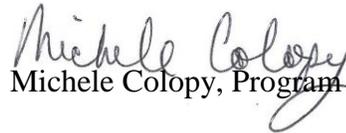
Sulfoxaflor *is* used outdoors as a foliar application, and *is* toxic to pollinating insects. Therefore, we strongly encourage EPA to return the “Bee Hazard” statement to the Environmental Hazard section of the re-registered Sulfoxaflor label. Inclusion of the hazard statement is necessary to inform applicators and state pesticide investigators of the bee toxic nature of Sulfoxaflor in the event of a misuse or off-target drift of the pesticide.

If corrected, the Sulfoxaflor label, with the nature of the hazard in the “Environmental Hazard” section, and the existing bee protective guidelines in the “Directions for Use,” the pesticide label would be both clear, and enforceable. Further, it would then be an ideal model to use in harmonization with other Extended Residual Toxicity (ERT) pesticide labels.

Pollinator Stewardship Council requests EPA reinstate the “Bee Hazard Statement” on Sulfoxaflor labels, and then strongly consider using the resulting label as a model for all other Extended Residual Toxicity pesticides.

Thank you for your thoughtful consideration and action in this matter.

Sincerely,

  
Michele Colopy, Program Director