



*Pollinator Stewardship Council*  
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December 21, 2016

The Honorable Gina McCarthy  
Administrator  
Environmental Protection Agency  
Office of the Administrator, MC 1101A  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

Jack Housenger  
Director  
Office of Pesticide Programs  
Environmental Protection Agency  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Administrator McCarthy, Director Housenger,

The Pollinator Stewardship Council has expressed concern about the increased toxicity and harm to pollinators from the mixture of chemicals contained in pesticide products and co-applied in the environment. The Environmental Protection Agency (EPA) has a duty to ensure that the use of these chemical concoctions will not unreasonably adversely affect humans or the environment. Yet the EPA consistently approves new uses and new products without adequate information to reach any reasoned conclusions.

We ask that the EPA require all information from applicants concerning mixture and co-application of ingredients before reaching any decisions to allow new, additional or continued uses of these chemicals. And, we ask that the EPA use this information to implement strict prohibitions and mitigations necessary to avoid the negative consequences on pollinators, our water, land, and wildlife; or if those consequences cannot be sufficiently mitigated, to deny these applications. In aid of this, we ask the EPA to recommit to a transparent process in which, to the greatest degree possible, the EPA provides information to the public, whether through notice of actions, publication of information (including studies and data) in the dockets, or timely responses to requests under the Freedom of Information Act.

The bottom line is whether the application of multiple ingredients can have a synergistic effect for certain combinations of pesticides. Without expressly requiring applicants to provide information on synergy, it is highly likely that the EPA is underestimating the negative impacts on the environment of pesticide exposure in its analyses. EPA cannot comply with its duty under the Federal Insecticide Fungicide and Rodenticide Act to ensure that its registration of pesticides will not result in unreasonable adverse effects on the environment.<sup>1</sup> Time is of the essence as the EPA continues to approve more uses of mixtures, like the new approval of the combination of dicamba and glyphosate for use on genetically-engineered crops.

In addition to products that contain either multiple active or inert ingredients that result in synergism, pesticide products can often be mixed or co-applied in the field in a way that results in synergistic effects. For example,

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<sup>1</sup> 7 U.S.C. § 136a(c)(5).

in the recent pollinator risk assessment for Imidacloprid, the EPA noted that this pesticide was often mixed with fungicides in tank mixtures.<sup>2</sup> In the risk assessment, the EPA stated:

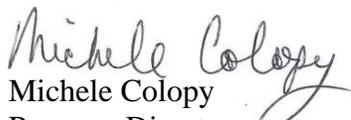
*“fungicides, particularly those of the sterol biosynthesis inhibitor class that include the triazole fungicides were detected with high frequency. There are reports in the literature that these chemicals may exhibit a greater than additive (e.g., synergistic) effect on toxicity when bees are exposed simultaneously with neonicotinoid chemicals like imidacloprid. While the extent of this relationship is beyond the scope of this assessment, it highlights the complex nature of interactions of different stressors that exist in the hive..”*<sup>3</sup>

These mixtures have real impacts on pollinators that the EPA must take into account and act upon when it makes pesticide registration decisions.

To aid in making informed decisions, the EPA must engage in a transparent process. Instead, the registration process does not afford the public a meaningful opportunity to participate because few, sometimes none, of the underlying studies or data are provided in the docket on Regulations.gov. We ask that the EPA engage the public, especially beekeepers, while it is making these decisions as fully as it is attending to the applicants. We have a real stake in these decisions, and need to have a mechanism for providing input to EPA.

Many pesticide products on the market are likely more harmful than the EPA has previously assumed because some of the most common combinations of ingredients cause synergistic effects, and most pesticide product labels do not meaningfully limit tank mixtures or co-application. Therefore, it is imperative that the EPA consider synergistic effects of pesticide products during its registration and registration review process, and include protective label restrictions to eliminate or mitigate adverse, synergistic environmental impacts. The EPA should prohibit tank mixes on the labels unless there is sufficient information demonstrating that no synergistic effects will occur. For example, pesticides such as the sterol biosynthesis-inhibiting fungicides known to disable the insect detoxification system, the EPA should prohibit applications to blooming crops. During the risk assessment risk mitigation process, the EPA should candidly engage with all of the stakeholders affected, including beekeepers.

Sincerely,

  
Michele Colopy  
Program Director

Enclosure

cc: Avi S. Garbow  
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<sup>2</sup> EPA Pollinator Ecological Risk Assessments: Imidacloprid Registration Review. Docket # EPA-HQ-OPP-2008-0844 (Jan. 15, 2016).

<sup>3</sup> *Id.* at 100.