



*Pollinator Stewardship
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Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001.
RE: EPA-HQ-OPP-2024-0154

July 3, 2024

To Whom It May Concern:

These comments are submitted relative to the application proposing to register new uses for a new pesticide product containing a currently registered active ingredient (dicamba) (EPA-HQ-OPP-2024-0154). Thank you for the opportunity to submit comments regarding the application for new use of dicamba herbicide and the associated proposed label. The Pollinator Stewardship Council (PSC) represents beekeepers of all types, ranging from commercial beekeepers to sideliners to hobbyists, as well as farmers and consumers who depend on honey bees for crop pollination. The American Beekeeping Federation (ABF) acts on behalf of the beekeeping industry on issues affecting the interests and the economic viability of the various sectors of the industry. Commercial and sideline beekeepers in the U.S. provide vital pollination services nationwide and are part of the agricultural system that ensures an abundant supply of fruits, vegetables, and nuts. The economic value of pollination services in the U.S. is estimated at \$20-30 billion annually and the work of pollinators is essential to a nutritious food supply.

EPA is reconsidering the registration of over-the-top use of dicamba-containing herbicides on genetically-modified crops (GMOs) such as soybeans, cotton, corn and

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others as a result of the February, 2024 decision by the U.S. District Court in Arizona in the case of Center for Biological Diversity et al v. U.S. Environmental Protection Agency and Bayer CropScience, LP. This is the second time that a Federal Court has nullified the registration of these dicamba herbicides. Whether EPA agrees with those decisions or not, this presents an opportunity to EPA to take a careful and critical look at the devastating impact that these dicamba herbicides have had, particularly in the areas in which they have been heavily used, and deny any further registrations of dicamba-based herbicides.

Dicamba is a highly volatile herbicide that has been in use since the 1960's. With the introduction of dicamba tolerant soybean and cotton, applications of dicamba have dramatically increased. As seen in the Assessment of the Benefits of Dicamba Use in Genetically Modified Dicamba-Tolerant Soybean Production (PC# 100094, 128931), the average annual use in soybeans increased from 410,000 lbs. (2014-2015) to 10,540,000 lbs. (2017-2018). Also, the Assessment of the Benefits of Dicamba Use in Genetically Modified, Dicamba-Tolerant Cotton Production (PC# 100094, 128931), illustrates an annual increase from 190,000 lbs. (2013-2014) to 3,440,000 lbs. (2017-2018). The information provided shows an increase of 2,470% (soybean) and 1,710% (cotton) with respect to the number of pounds of dicamba applied. The enormous increase has resulted in damage or destruction of pollinator habitat throughout the application areas.

Scientific studies are being conducted to measure the effects of dicamba off target movement on pollinators and their habitat. Recently, a study titled "Off-target drift of the herbicide dicamba disrupts plant-pollinator interactions via novel pathways" (R. Baucum ,et.al) was published. This study found "Our pollinator abundance surveys found a 70% reduction in pollinating insects within dicamba-exposed experimental plots compared to the control plots" and "Our results highlight that dicamba, which has no currently known direct effect on pollinating insects , indirectly influences pollinator health by reducing the abundance and complexity of floral resources that beneficial natural habitats surrounding crops provide to pollinators."

The volatility of dicamba is a key component of why the herbicide is causing tremendous amounts of damage to the environment. As an example of the extent to which dicamba herbicides may travel after volatilization, inspectors of the Arkansas State Plant Board have confirmed dicamba damage to trees and other plants throughout the Dale Bumpers Wildlife Refuge, a 140-mile-long forested area along the White River in southeast Arkansas. A substantial number of the trees with confirmed dicamba damage were in the middle of the Refuge, miles from any crop fields where dicamba herbicides might have been applied. Further, multiple State agencies and conservation groups have observed and reported similar findings.

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It is well known that beekeepers place beehives near soybean and cotton fields for honey production. In return, the soybean and cotton yield is enhanced due to honeybees pollinating the soybean and cotton plants. The symbiotic relationship between soybean and cotton producers and commercial beekeepers has been demonstrated for decades. With the introduction of Dicamba Tolerant Soybean and Cotton, honeybees are being exposed to new hazards regarding dicamba. EPA has acknowledged that there are no studies with regards to DCSA, a metabolite of dicamba found in Dicamba Tolerant Crops after dicamba is applied. In the Draft Ecological Risk Assessment EPA said “DCSA exposure could occur in pollen and nectar residues of Dicamba Tolerant Crops.” Research should be completed to determine the toxicity of DCSA to honeybees before a new registration is granted. Also, EPA acknowledges, “Finally, there is potential for inhalation exposure given that dicamba is semi-volatile. However, EPA does not have methods to assess exposure to bees from vapor inhalation and does not have inhalation toxicity data. Therefore, it is unknown if dicamba poses a risk concern to invertebrates from this pathway.” Given the uncertainty of these potential effects on honey bees, more studies should be conducted.

Even in the absence of this data, the current evidence is abundantly clear that the use of dicamba is having a negative impact on pollinators and their habitat. For all of the reasons discussed above, PSC urges EPA to reject the proposed application for “new use” of an herbicide that has wrought entirely unacceptable pollinator habitat injury over the past seven years. No prior label amendments have come anywhere near reducing dicamba vapor and spray drift to “acceptable” bounds, and neither will this one. Over seven long years, EPA has failed abysmally in its duties to “follow the science” and to protect the environment and the beekeeping community from dicamba. It is time for EPA to put an end to this dicamba debacle and reject the registration of over-the-top use of dicamba-containing herbicides on genetically-modified crops (GMOs) such as soybeans, cotton, corn and others.

Sincerely,

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