



Pollinator Stewardship Council
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Rick Keigwin
Director, Pesticide Re-evaluation Division,
U.S. Environmental Protection Agency
Ariel Rios Building, MC 1101A
1200 Pennsylvania Ave. NW
Washington, D.C. 20004
keigwin.richard@epa.gov

Dear Director Keigwin,

The harm of neonicotinoid coated seeds to honey bees and to aquatic systems is becoming clearer. The nation's beekeepers, represented by the American Honey Producers Association, the American Beekeeping Federation, and the Pollinator Stewardship Council, seek some protective steps for their industry. The *non-mandatory* seed bag/tag labels *do not* provide adequate protections for honey bees and the lack of any enforcement of dust-off caused bee kills is a major hardship for our industry. We know such kills are largely neglected by State enforcement officials now as they are not considered as resulting from pesticide applications.

The bee industry asks the Environmental Protection Agency (EPA) to send an administrative memo to the State Primacy Partners requiring them to fully investigate any possible pesticide dust, guttation, contamination of nectar and pollen, and harvest dusting incidents reported to them, and to provide the investigation reports to the EPA in a timely manner.

The bee industry asks that EPA provide a clear official interpretation, preferably in the Federal Register or at least on the EPA website, explaining in detail how the agency views the treated article exemption as it applies to the growing of a crop from systemic insecticide-laden seeds. Please include the circumstances when the exemption may not apply to pesticide-coated seeds used to grow specific bee attractive crops.

This clear official interpretation will provide needed guidance to state enforcement officials. Also, we ask that you begin the process of imposing more rigorous, detailed, protective language for the seed bags/tags, with clearer specifications for ways in which farmers may avoid causing kills of non-target beneficial animals such as honey bees, and avoid contamination of soil, marginal vegetation, and water. *We believe farmers need and want that language as they do not want to cause unnecessary harms.* We can provide more specific language for the seed bags/tags if requested.

Thank you for your consideration of these requests, as progress on these issues is essential to the continuation of successful beekeeping, crop pollination services, and honey production over the long-term across large portions of the nation.

Sincerely,

Michele Colopy
Michele Colopy, Program Director



Darren Cox
Darren Cox, President
American Honey Producers Association



Gene Brandi
Gene Brandi, President
American Beekeeping Federation

