

***CLA Pollinator Issue Management Plan
June 2017 (updated)***

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Committee or IMT: Pollinator Issue Management Team
Chairperson: Ray Brinkmeyer, Dow AgroSciences
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Background: Actions in the US, Europe and Canada, a few bee-kill incidents, and numerous conflicting reports on what might be impacting bees have prompted regulatory decisions, legislative proposals, and lawsuits that would restrict the use of crop protection products without a valid FIFRA risk assessment process. While neonicotinoid insecticides were the original focus and continue to gather major attention, recent activities are impacting and implicating other products –insecticides, fungicides, etc.

Vision: Society benefits from having access to effective crop protection tools and healthy bees.

CLA Goal: Ensure the right of our members to register and sell their products through a predictable, science based regulatory process, while sustaining pollinator health.

Resource Needs: Although many activities are covered in the CLA budget, it is likely that additional resources and increased coordination of activities will be necessary to positively influence pollinator activities. Contributions and member-volunteer time will have to be increased to support efforts such as developing science based pollinator policy, responding to lawsuits and adverse publications, etc.

Regulatory, scientific, legislative, legal, communication and stewardship components must be addressed, along with increased coordination across CLA issue management teams. Actions from the Federal Agencies and States must also be addressed, as well as coordination with international agencies.

Objectives:

- **Ensure that EPA uses an appropriate regulatory process for pollinator protection that is science-based and consistent with FIFRA requirements. Challenge EPA on the size and breadth of the pollinator testing program (including Apis, non-Apis and other pollinators) and RA process. Determine its impact on regulatory policy [REGULATORY]**
- **Continue to develop appropriate science related to the issue of bee health; coordinate activities with PRTF. [SCIENTIFIC]**

- **Implement a plan for CLA communication and outreach to allies that positions the industry favorably on the issue of bee health. [COMMUNICATION]**
- **Position the industry as an active promoter of bee health, and advance best management practices which emphasize bee safety. [STEWARDSHIP]**
- **Address Congressional and State government concerns (including enforcement); avoid state-by-state restrictions. [LEGISLATIVE]**
- **Monitor and respond to legal activities. [LEGAL]**

OVERALL 2017 Goals based on those objectives are:

- Build relationships with new EPA and USDA administration
- Engage with EPA in Acute Policy implementation
- Support State Managed Pollinator Protection Plans (MP3s)
- Support the current tiered honey bee risk assessment process
- Engage EPA on issues related to Testing (e.g. Chronic Larval Study), data evaluation, value of test data vs. cost, etc.
- Engage with EPA and stakeholders on the native bee issue
- Continue stakeholder outreach to growers/beekeepers on areas of common interest
- Utilize communication plan on pollinators with new EPA admin, lawmakers, states, and stakeholders
- Create a strategy for state and local engagement as NGO pressure increases

Objective 1. Regulatory

Ensure that EPA uses an appropriate regulatory process for pollinator protection that is science-based and consistent with FIFRA requirements. Challenge EPA on the size and breadth of the pollinator testing program (including Apis, non-Apis and other pollinators) and RA process. Determine its impact on regulatory policy

- (a) ***Federal:*** Registration actions must be linked to a valid science-based risk assessment that considers risk and benefits. Label language, interpretative label guidance, and enforcement must be consistently linked to the risk assessment and practical to implement. Engage regularly with decision makers at EPA and USDA to positively influence activities regarding pollinators.
- (b) ***State:*** Registration actions must be linked to a valid science-based risk assessment that considers risk and benefits. Label language, interpretative label guidance and enforcement must be consistently linked to the risk assessment and practical to implement. Engage regularly with decision makers within State lead agencies, including SFIREG, NASDA, AAPCO, etc., to positively influence activities regarding pollinators.
- (c) ***International:*** Actively engage and influence regulatory authorities outside of the US in conjunction with CLI, ECPA, CropLife Canada, and other allied organizations.

Actions: (NOTE: see 2014 Plan for actions which have been completed)**1.2. *Regulatory & Labeling Strategy*****Short-term Initiatives (2017)**

- (a) Work with AAPCO Pollinator Team and state regulators on implementation of state plans and MP3s (PIMT has a member on the AAPCO team and state regulators have been regular attendees of PIMT meetings)
- (b) Actively participate in activities of the PPDC State Plan (MP3) Work Group (PIMT has 2 members)
- (c) Work with CropLife Canada to harmonize approaches to pollinator exposure mitigation between EPA and PMRA as appropriate.
- (d) Continue interaction with Pollinator Labelling Working Group (MCFA, growers, PIMT, beekeepers) to jointly organize a USDA pesticide stakeholder meeting and the USDA longitudinal study
- (e) Build strong relationship with new OPP admin (RD, EFED, and PRA)
 - Regular face to face meetings with Goodis, Echeverria, Guillarín
 - Acute policy implementation, cost
 - Tier 1 and Tier 2 testing; cost vs. value of testing
 - Contract lab availability and quality (2016 survey)
 - Pollinator testing (DCI) in Registration Review
 - Regulatory reform
 - Maintain holistic view regarding the impact of pollinator policy on growers - major classes of insecticides as well as new a.i.s are impacted
- (f) Build strong relationship with USDA – engage with EPA in areas of common goals including crop attractiveness; growers having adequate tools; over regulation by OPP; risk / benefit documents

Extended-term Initiatives [2017 and Beyond]

- (g) Maintain science-based focus on issue and solutions.
- (h) Develop practical exposure mitigation techniques, to include consideration of the following factors:
 - Application form (e.g. foliar vs. seed treatment vs. in-furrow);
 - Chemical nature of pesticide (e.g. systemic vs. laminar);
 - Crop characteristics (e.g. bee attractiveness, relative acreage).
- (i) Incorporate/anticipate non-agricultural uses into pollinator issue.
- (j) Resistance management
- (k) Seed treatment

Objective 2. Scientific**2.1. Continue to develop appropriate science related to the issue of bee health; coordinate actions with PRTF.**

- (a) Actively participate and influence the development of science based risk assessments.
- (b) Actively participate with EPA in the design of new pollinator studies.
- (c) Support and engage in research regarding bee health and bee management practices.
- (d) Respond to published papers and reports as necessary.
- (e) Support and advance research to control *Varroa* mite and promote better bee nutrition.

Related Actions - PRTF

- (f) ***Coordinate and support*** industry “Pollinator Research Task Force” to design new data studies and respond to EPA demands
- (g) Develop ready response capability to new research or studies which may or may not be accurate or relevant; much “new” science is not validated (monitor and respond).
- (h) Identify most critical bee research needs (role of diet, stressors, *Varroa* mite control, etc.) and determine how to fill the data need (include validation).
- (i) Refine appropriate risk assessment methods most useful and relevant to pollinator health or potential impacts of pesticides (include interaction with universities to make their work (e.g. field data) more useful for risk assessment)
- (j) Non- *Apis* bee workshop
- (k) USDA longitudinal study with MCFA
- (l) Chronic larval study
- (m) Honey bee pollen and nectar consumption – improving BeeREX Exposure assessment paradigm for non-*Apis* bees
- (n) Honey bee overwintering survival modeling project
- (o) Pesticide a.i. vs. formulation toxicity analysis
- (p) Guttation water and surface water exposure

2.2. *Science & Research Strategy*

Intermediate-term Initiatives

- (a) Establishment of an industry “Pollinator Task Force” to design new data studies and respond to EPA demands. [Joe Wisk] Although EPA has only recently developed risk assessment guidance for pesticides and bees, even the Agency has acknowledged that additional data is needed to address identified uncertainties. The formation of a Task Force that could work with the Agency to generate generic data and fund basic research to improve the risk assessment process would benefit both the Agency and CLA member companies. Some potential activities include:
 - Compiling or generating pollen and nectar residue data to better quantify exposure;
 - Funding basic research to determine better consumption data for honey bees and possibly non-*Apis* bees;
 - Funding research for developing population models for non-*Apis* bees.

- (b) Develop ready response capability to new research or studies which may or may not be accurate or relevant; much “new” science is not validated (monitor and respond).
- (c) Identify most critical bee research needs (role of diet, stressors, *Varroa* mite control, etc.) and determine how to fill the data need (include validation). This may be the type of activity the Honey Bee Health Coalition and/or the CLA Stewardship committee may want to pursue.

Extended-term Initiatives

- (d) Refine appropriate risk assessment methods most useful and relevant to pollinator health or potential impacts of pesticides (include interaction with universities to make their work (*e.g.* field data) more useful for risk assessment)

Thing to consider: Success of studies – what is it? CRO reliability? Study reviews – are we seeing a trend toward more “Accepted “studies?

Used for RA but are “supplemental”

Exposure refinement – *e.g.* AFRI grant to Iowa St. Also look at Greg Krueger U of NE

Endpoint selection has become an issue – Push to ERAC

EPA choosing numbers out of studies rather than looking at holistic results of the study

All field studies have issues – need to look at whole study results – weight of evidence rather than worst case

Mixture issue - with other ai’s and adjuvants

Never talk about failures only successes

Objective 3. Communication

3.1. Implement a plan for CLA communication and outreach to allies that positions the industry favorably on the issue of bee health.

- (a) Proactively shape the conversation in the new media realm with respect to pollinators.
- (b) Publish information about crop protection products and bees.
- (c) Monitor and respond when appropriate to articles, tweets, etc.
- (d) Engage with traditional (commodity groups, PPC) and non-traditional allies (NGOs) to influence regulatory, legislative, and legal actions with respect to pollinators.
- (e) Actively engage in public activities (HBHC, NAPPC, summits, USDA events, etc.) that address bee health and best management practices.
- (f) Develop webinars on bee health for public, etc.
- (g) Develop events that bring diverse groups together to discuss pollinator topics.

Related Actions

3.2. *On-going: Utilize Strategic social media approach*

- (a) Minimize negative association of crop protection products with effects on pollinators.
- (b) Address the multiple stressors that impact pollinators.
- (c) Participate in direct communication with beekeepers.
- (d) Emphasize success stories.
- (e) Remain current on overall bee health status.
- (f) Participation of OPP Management and Scientists in CLA Spring Regulatory Conference -- Pollinator Sessions (Done 2017)
- (g)

3.3. *Implementation*

Communication has become increasingly important as the pollinator issue has moved to a more public, media-driven issue set, expanding beyond a scientific or regulatory matter. Outreach to allies, customers, and state officials has become more important. Activities include:

- (a) Continue media-monitoring (twitter-verse, print, etc.) and be ready to respond immediately in the modern news coverage/news cycle world.
- (b) Communications outreach team is holding 2014 Brainstorming meeting in early January:
 - Need to identify priority audiences;
 - “Expand the conversation around pollinators” in the twitter space;
 - Identify within CLA who “owns” the various third party relationships.
- (c) Develop and maintain “message bible” to help coordinate consistent and appropriate messaging.
- (d) Communicate with commodity groups: as allies, need to energize their involvement as they will bear the brunt of any new restrictions or requirements; as customers, they may benefit from appropriate training from registrants or information available from the Extension Service.
- (e) Identify “grass roots” relevant activities (local success stories; non-regulatory approaches).
- (f) Outreach to university researchers who could be independent validators.
- (g) Interact with professional societies to get ensure accurate information is available generally and/or to media.
- (h) Develop means to monitor or organize interaction with state officials; contact with state officials will be critical for new label approval and determining any impacts as new labels get into the field.
- (i) Maintain professional relationship and open lines of communication with beekeepers.

Objective 4. Stewardship

4.1. Position the industry as an active promoter of bee health and advance best management practices which emphasize bee safety.

- (a) Proactively promote best management practices for our products.

- (b) Actively participate in the development and advancement of best management practices for bee health.
- (c) Actively participate in the development and advancement of bee management practices.
- (d) Partner with groups like ASTA, PSEP, AAPCO, NASDA and AAPSE to promote stewardship and education activities.
- (e) Determine if new label language is doable (*i.e.*, steward new labeling).

Related Actions

4.2. *Make IMT responsible as focal point for communications and activities across CLA regarding bee health*

- (a) Build a team that consolidates all bee activities, and has comprehensive cross-functional plan
- (b) Coordinate with global colleagues on the issues. CropLife Canada, ECPA

4.3. *Develop, support, and provide guidance for a pollinator plan that serves the needs of multiple stakeholders including:*

- (a) Grower groups dependent on pollinators (almonds, melon, blueberry, etc.)
- (b) Grower groups, not dependent on pollinators (corn, cotton, soybean, etc.)
- (c) USDA (OPMP and ARS)
- (d) Academia
- (e) Equipment manufacturers
- (f) Beekeepers and their organizations
- (g) State governments
- (h) Pollinator protection groups

4.4. *Actively participate in activities and meetings sponsored by beekeepers to become knowledgeable about pollinator issues, technology and goals.*

4.5. *Advance programs developed by stakeholders:*

- (a) NAPPC training video;
- (b) Beekeeper forage proposal to USDA

4.6. *Address the role beekeepers could have as part of increasing bee health*

[Summit Team: *Joe Wisk*, Julie Schlekau, Iain Kelly, Barb Glenn]

- (a) Best Management Practices should be developed to include considerations of best handling practices, forage, and other factors which contribute to bee health.
- (b) If bee registries will be part of new regulatory requirements, standardization of registries will help compliance with new labels.
- (c) CLA can be supportive in the Farm Bill implementation re: research and increased habitat, among other elements of the beekeepers' agenda.

4.7. *Educate and partner with commercial beekeepers to ensure that their focus is placed on the most significant contributing factors to pollinator health declines* [Joe Wisk]

- (a) Support and promote research on *Varroa* and other honey bee pest and disease control.
 - Promoting member companies' activities to develop new *Varroa* control technologies
 - Promoting and possible funding of research about the impact of *Varroa* on honey bee health
- (b) Partner with beekeepers to support research and opportunities for enhancing forage and improving bee nutrition.
 - Continuing to partner with beekeepers to petition the federal government to allow commercial beekeepers access to conservation lands.
 - Promoting and potentially fund research around bee nutrition
 - Working with organizations like Project *Apis m.* and The Pollinator Partnership to develop pollinator-attractive forage areas
- (c) Support research and activities to promote best management practices for beekeepers to improve hive management
 - Explore ways to promote communication between beekeepers and growers/applicators
 - Petition States to require beehive registries
 - Lobbying USDA, State Apiarists and honey bee researchers to promote hive management research and educate commercial beekeepers on hive management practices
- (d) Continue to educate beekeepers on pesticide research and risk assessment process for honey bees; counter biased and scientifically-questionable research conducted by USDA and academics
 - Exploring speaking opportunities at national and local beekeeping organization meetings
 - Inviting beekeepers to visit study sites and company research centers
 - Urging companies to explore opportunities to publish industry-sponsored research
 - Urging companies to explore opportunities to publish industry-sponsored research

Objective 5. Legislative

5.1. Address Congressional and State government concerns (including enforcement); avoid state-by-state restrictions.

- (a) Proactively engage and influence state and federal legislators regarding any bills
- (b) Engage in outreach and education of law makers at the state and Federal level on bee health, bee management practices and impacts on agriculture
- (c) Develop legislation that positively impacts bee health (forage, varroa mite research, etc.) and bee management practices (commercial and hobbyist)

State level document, eg., MP3, legal, legislation, messages, state partners as resources, list of experts for states

Related Actions

5.2. *Understand current state system for investigation and enforcement of acute bee kills; evaluate areas for improvement*

Monitor state activities as they develop pollinator-related policies, including bee registries, BMPs

5.3. *Communicate with SLAs, SFIREG, and AAPCO to determine appropriate areas for joint action:*

- (a) Engage with SFIREG representatives on neonic label language interpretation.
- (b) Make state representatives regular participants at IMT meetings.
- (c) Develop mutual understanding of risk assessment approach to bee safety and label language.
- (d) Develop shared goals.

IMT participate as needed at AAPCO and SFIREG events.

Commodity Coffee -- acute policy when it is implemented\

Commodity Coffee – to discuss impact of pollinator actions at EPA on major classes of insecticides – OPs, neonics, pyrethroids

- (e)

Objective 6. Legal

6.1. *Monitor and respond to legal activities*

- (a) Initiate legal action as necessary to ensure a sound, science-based regulatory process and to defend our right to do business.
- (b) Defend our right to do business in lawsuits initiated by others.
- (c) Monitor and respond when necessary to activities of NGOs.
- (d) Coordinate across CLA IMT groups.

Related Actions

6.2. *Prepare for potential legal activities by external parties*

Anticipate possible litigation areas, for example: conducting a legal review of case law for the actual requirements of pollinator protection where they are invited guests as opposed to where they are unintended visitors.

6.3. *Monitor EPA actions which may be outside of FIFRA required procedures*

“Regulation by letter” and “guidance” may extend beyond statutory tools to impose regulatory controls.

6.4. *Coordinate across CLA IMT groups/Internal CLA coordination* [Team:

Kellie Bray, Scott Schertz, Iain Kelly, Rachel Lattimore] Organize improved coordination across IMT groups as the pollinator issue has become a Tier 1 issue.

Possibilities include:

- (a) Coordination with State Affairs and RISE (especially as new labels are in field).
- (b) Law Committee engagement with Registration Committee to ensure against EPA “policy by letter”.
- (c) Pollinator data requirements and science/research issues coordinated across eco-risk, registration, pollinator IMTs.
- (d) PIMT members accompany FAC members to Hill meetings.