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# OREGONIANS FOR FOOD & SHELTER

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A non-profit coalition to promote the efficient production of quality food and fiber while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology.

## SB 882 -- Relating to preventing environmental harm from neonicotinoids

30 March 2015

### Testimony to the Senate Committee on Environment and Natural Resources

Honorable Committee Members:

Oregonians for Food & Shelter (OFS) is a grassroots coalition of farmers, foresters, and other technology users focused on natural resource issues involving pesticides, fertilizer, and biotechnology. We are writing you today in opposition to Senate Bill 882 which would ban four neonicotinoid insecticides. We thank you for the opportunity to submit comments on this important issue.

The concerns around pesticide use and potential effects on bees are very important to all pesticide users, but especially those involved in agriculture. Oregon farmers depend on bees to pollinate many of their crops, but also depend on pesticide tools to control destructive pests. Similarly, commercial beekeepers rely on healthy crops to optimize their pollination services. This means that Oregon growers and beekeepers have a lot at stake in this conversation and each share a vested interest in ensuring that protecting bee health, and the use of pesticides, are not mutually exclusive. Bee health is important to all of us and nobody wants to see adverse incidents that add to bee population declines. That being said, it is easy to let emotion drive the conversation around these issues, when we should instead let science be our guide.

While concerns about pesticides and bees have been around for several decades, two high profile incidents in Oregon during the last couple of years have brought heightened attention to the issue. We cannot stress enough that very visible adverse incidents need to be viewed in light of what happened in particular scenarios—not necessarily as evidence of a wider problem. The science-based labels are the law and we regularly remind our members of the importance of reading and following them. Incidents of illegal applications should be addressed accordingly on a case by case basis but should not be used as a reason to add more restrictions on legal use.

Unfortunately, anti-pesticide activist groups have used these incidents as a springboard to further restrictions on neonicotinoids. This is in spite of the science showing that when used according to the label, neonicotinoids pose no unreasonable risk to humans or the environment—including pollinators. Extensive research in Europe and North America has shown that long-term colony health is linked to parasitic mites (especially the invasive Varroa mite) and diseases, but not with pesticides, including neonicotinoids.

When considering regulations surrounding pesticides it is always important to look at what regulations are already in place. All pesticides used in Oregon must go through the U.S. Environmental Protection Agency (EPA) and Oregon Department of Agriculture (ODA) registration processes. At the federal level this happens under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Initial and ongoing re-registration is subject to a substantial review process and registered products must meet the high standard of having “no unreasonable adverse effect on health or the environment.” This means that the pesticides of concern in these cases have had extensive safety testing including:

- Honeybee acute contact toxicity (all outdoor use products)
- Honey bee toxicity of residues on foliage (if high acute toxicity and exposure likely)
- Field testing for pollinators (specific conditions)

While we can understand the concerns of beekeepers, and the public at large, the issue of declining bee populations unfortunately has no simple answer. In fact, research on Colony Collapse Disorder (CCD) has highlighted a complex interaction of factors that play a role in bee health and found no singular cause of the problem. While pesticides are often noted as one factor, they are not considered the primary one.

Since reports of significant losses to bee colonies were publicized in 2006, researchers and regulators have been looking for answers to what may be the cause. A CCD Steering Committee was formed at the national level to address the concerns over bee losses. Several individuals from the Steering Committee along with Pennsylvania State University met in October 2012 for a National Stakeholders Conference on Honey Bee Health to discuss future actions to promote health and mitigate risks to managed honey bees in the U.S. In May of this year the U.S. Department of Agriculture (USDA) and EPA released a comprehensive scientific report on honey bee health. The report concludes that there are multiple factors that play a role in honey bee colony declines. Findings from the report include:

- Recognizes the Varroa mite as the *“single most detrimental pest of honey bees and is closely associated with overwintering colony decline”*
- Notes multiple diseases associated with CCD, many of which are amplified by the Varroa mite.
- Urges adoption of Best Management Practices (BMPs) to enhance bee health.
- Recognizes the need to significantly improve genetic diversity in U.S. bee populations.
- Recommends increased nutritional options (forage) to lessen susceptibility to stressors.
- Recommends continued research on pesticide impacts at field-relevant exposures.
- Calls for greater collaboration and information sharing among stakeholders to facilitate adoption of BMPs that are critical to improving bee health.

Recognizing this reality, the Oregon Legislature took a proactive step to address pollinator health last year. In the 2014 legislative session, OFS supported House Bill 4139 which established a Pollinator Task Force which was tasked with finding collaborative solutions to pollinator concerns. The diverse 10-member board, which OFS served on, met seven times in 2014 and released their final report with priority recommendations. The four priority recommendations were:

- Oregon should develop a strong, effective outreach and education strategy on pollinator health, including best management practices.
- Oregon should fully fund a state-of-the-art bee health diagnostic facility at Oregon State University.

- An integrated pollinator health research plan should be developed and funded to improve understanding of the many issues affecting pollinator health.
- A sustainable revenue stream to fund the proposed outreach, education and research programs is needed.

It should be noted that this diverse group of stakeholders agreed that the best way to move forward was not with more regulation of pesticides, but with collaborative approaches to education, outreach and research. This group spent over 6 months working on this issue and there were good reasons for further restrictions on neonicotinoids not being a priority, or even consensus, recommendation.

Despite the recognition by national experts that a variety of factors is contributing to bee colony losses, some groups continue to focus on the role pesticides play, and especially on the neonicotinoid class of chemicals. Neonicotinoids have been in use for more than 15 years and have been widely adopted by growers and urban applicators because of their performance, lower toxicity to mammals, including humans, and favorable environmental profile over the older products they replaced. Their potential toxicity for bees if used improperly has shined a spotlight on neonicotinoids, but real world testing of concentrations in the field have not shown levels that would be of concern.

Several times over the past few years, advocacy groups and some individual beekeepers have petitioned or sued the EPA to discontinue the use of neonicotinoid insecticides, claiming these products are harming bees. In considering these petitions, the EPA rejected such claims and in comments regarding clothianidin (a neonicotinoid pesticide), stated that<sup>1</sup>:

***...the Agency is "NOT aware of any data that reasonably demonstrates that bee colonies are subject to elevated losses due to chronic exposure to this pesticide." (02/18/11); and***

***"... is NOT aware of any data indicating that honey bee declines or the incidence of CCD in the U.S. is correlated with the use of pesticides in general or with the use of neonicotinoids in particular." (07/27/12)***

It is the latest scientific evidence that lead the UK to oppose the moratorium on use of two neonicotinoids in Europe as well. A report issued by the UK Department for Environment Food & Rural Affairs in March of 2013 concluded that;

***While this assessment cannot exclude rare effects of neonicotinoids on bees in the field, it suggests that effects on bees do not occur under normal circumstances. This assessment also suggests that laboratory based studies demonstrating sub-lethal effects on bees from neonicotinoids did not replicate realistic conditions, but extreme scenarios. Consequently, it supports the view that the risk to bee populations from neonicotinoids, as they are currently used, is low. <sup>2</sup>***

In Australia, where the Varroa mite is not present and where neonicotinoids are extensively used, the bee health situation is informative. In its recent 92-page report, the Australian Pesticides and Veterinary Medicines Authority examined the impact of that country's extensive use of neonicotinoids, concluding;

<sup>1</sup> <http://www.usda.gov/documents/ReportHoneyBeeHealth.pdf>

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221052/pb13937-neonicotinoid-bees-20130326.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221052/pb13937-neonicotinoid-bees-20130326.pdf)

***“...the introduction of the neonicotinoids has led to an overall reduction in the risks to the agricultural environment from the application of insecticides” and that “Australian honeybee populations are not in decline, despite the increased use of this group of insecticides in agriculture and horticulture since the mid-1990s.”<sup>3</sup>***

This month, results from a three-year bee study conducted by scientists from the University of Maryland, the U.S. Environmental Protection Agency and the U.S. Department of Agriculture confirmed what other research has already shown – that field-relevant exposures of neonicotinoids have negligible effects on honey bee colony health.

While the current research is not showing neonicotinoids as a primary factor in bee health decline, we know that it may be tempting to place restrictions on their use for precautionary reasons. Unfortunately this approach ignores the important role these products play in managing pests that can have devastating effects on the environment. Neonicotinoids provide unique environmental, economic and public health benefits, such as:

- Effective protection against invasive species which can harm important urban landscapes. (i.e. control of the Emerald Ash Borer which can devastate urban forests).
- Systemic insect control not provided by other chemical classes.
- Lower impact on many non-target organisms than the older products they replaced, protecting natural enemies which allows for greater use of IPM strategies.
- Effective control of disease carrying vectors. They are some of the most effective tools for the control of bedbugs.
- Extended control which limits the needed number of applications, and therefore limits applicators exposure.
- Control of pests which are resistant to other chemical classes

We believe that a thorough review of the data shows that neonicotinoids are a safe, effective tool for protecting human health and property. A ban on these important products will result in less options to contain destructive pests with little, if any, benefit to bee populations. Neonicotinoids are a safe and effective tool for managing unwanted pests. In light of the current science we ask you to vote NO on SB 882.

Thank you for your consideration, and please contact us if you have any questions.

Sincerely,



Scott J. Dahlman  
Policy Director  
Oregonians for Food & Shelter

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<sup>3</sup> Overview Report – *Neonicotinoids and the Health of Honey Bees in Australia* (February, 2014). Australian Pesticides and Veterinary Medicines Authority 2013. ISBN: 978-1-922188-51-9 (electronic). 92 pages.