



May 9, 2014

President Barack Obama  
 The White House  
 1600 Pennsylvania Avenue NW  
 Washington, DC 20500  
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**Re: Policy Recommendations Following White House Bees/Pollinators Meeting**

Dear President Obama,

Since 2006 we have watched the precipitous decline of honey bees—vital pollinators that are the bedrock of our food system and agricultural economies. We write to urge your immediate action to protect bees, especially from the use of bee-toxic pesticides. The U.S. Environmental Protection Agency and U.S. Department of Agriculture have failed to take necessary steps to protect bees, and plan to take little or no action for at least another four years.

Increasingly, scientific studies point to the harm from the use of neonicotinoid insecticides—both alone and in combination with other factors—to bees. Neonicotinoids are a widely used class of systemic pesticides that are applied as seed treatments, foliar sprays and as granules; they are taken up throughout the vascular system of a plant and then expressed through pollen, nectar and guttation droplets where pests and beneficial insects like bees encounter them.

The weight of the evidence suggests that neonicotinoids—including imidacloprid, clothianidin, thiamethoxam, dinotefuran, thiacloprid and acetamiprid—are linked to an increasing number of bee kills across the country, and act in synergy with multiple factors such as habitat loss, poor nutrition, pathogens and varroa mites to drive bee declines.

Neonicotinoid use deserves attention and is, in many cases, unnecessary. Research from a Purdue University research team has performed two years of field trials of neonicotinoid-treated seeds and found no added benefit to crops—or to farmers’ bottom lines—from the use of neonicotinoids.

U.S. agriculture, including many commercial beekeepers and the agricultural economies they support, rests on bees. Cornell University researchers put national estimates of bees' pollination services at over \$19 billion annually and USDA estimates pollinator services at \$20-\$30 billion.

Last year was the worst year on record for many beekeepers, and these historic losses are part of a larger trend. Since 2006, beekeepers have lost approximately 30% of their hives each year, twice what is considered normal or sustainable. According to the Bee Informed partnership, U.S. beekeepers lost 45% of the colonies in their operation during the winter of 2012/2013. And those operating in California almond orchards lost more than 50% of their bees.

Based upon the evidence, and the urgency of these losses, other governments across the globe have already taken action to protect bees. In 2013, the European Union voted for a two-year suspension on major uses of the three most common neonicotinoids: imidacloprid, clothianidin and thiamethoxam. The decision came on the heels of comprehensive, peer-reviewed research conducted by the European Food Safety Authority, which indicated that those three insecticides pose both acute and chronic hazards to honey bees and that significant gaps exist in the data needed to assess their safety.

As a result, the undersigned groups are very concerned with EPA's continued approvals of neonicotinoid insecticides. Federal officials have acknowledged that here, as in Europe, the original risk assessments and registration data requirements focused on acute honey bee mortality and failed to adequately consider other key risks to colony health. This means the EPA approval of hundreds of neonicotinoid products were based on inadequate assessments. Yet, to date, officials have done very little to protect bees and beekeepers.

We are calling on you to take decisive action and act with urgency to protect pollinators from neonicotinoid pesticides. We urge you to adopt practices that protect bees from the use of these pesticides. While use of neonicotinoids has become more widespread, it is the responsibility of government agencies to provide the support and resources to move towards safer alternatives. As a result, we urge you to do the following:

- **Expediently complete the current review of neonicotinoids using independent and field-relevant data.** EPA's current review is scheduled to conclude in 2018. We urge EPA to include recent data on the failure of neonicotinoid seed treatments to consistently increase yields and profitability in its cost-benefit analysis.
- **Restrict, and potentially suspend, the use of neonicotinoids.** EPA should further restrict the times, methods of application, and locations of neonicotinoid use in order to protect bees. In cases where bees can't be successfully protected, we urge you to suspend the use of neonicotinoid products.
- **Reform policies that encourage the use of neonicotinoids.** Policies from USDA, including crop insurance premiums, have encouraged farmers to move away from

agroecology and biocontrol. In many cases nursery owners use neonicotinoids unnecessarily in order to meet restrictions in quarantine zones or to certify nursery crops as pest-free.

- **Close EPA's conditional registration loophole.** Conditional registration allows a new active ingredient to enter the market for an unspecified period of time while the registrant gathers safety data requested by EPA. EPA's own analysis of the program between 2004-2010 confirms that this process has been misused in 98% of cases. Roughly 65% of the 16,000 currently registered pesticide products—including clothianidin and other neonicotinoids—have been rushed to market before basic toxicity testing through conditional registration.
- **Ensure labels are up to date.** Require a bee hazard statement on the label of all pesticides toxic to pollinators, not just foliar use products.
- **Make sure we have all the data.** Prior to registration of any new pesticide with high bee toxicity, require a comprehensive data set on pollinator toxicity, including sublethal toxicity. In addition, pesticide seed treatments should be fully assessed for impacts. Close the current loophole that exempts neonicotinoid-treated seeds from federal pesticide regulations.
- **Support research of safe alternatives to neonicotinoids.** USDA funding should support agricultural research of ecosystem-based pest approaches that protect pollinator and human health.
- **Increase resources and incentives for farmers to protect honey bees.** Widespread use of neonicotinoid seed treatments has shifted our nation's farming practices away from integrated pest management. USDA's educational programs and funding opportunities should educate farmers on the risks of neonicotinoids to pollinators while supporting farmers to purchase neonic-free seed, use less-toxic alternatives to neonicotinoids and create pollinator habitat and forage.

We cannot wait until 2018 for U.S. EPA's evaluation of neonicotinoids, or five to ten more years for USDA's action plan. EPA and USDA have shirked their duty. The White House should set a new course to protect bees, and in doing so, support a healthy and prosperous food and farming system.

Thank you for your consideration. We look forward to your response.\*

Sincerely,



Judy Hatcher  
Executive Director  
**Pesticide Action Network**



Juliette Majot  
President  
**Institute for Agriculture and Trade Policy**

Bob McFarland  
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June 19, 2013

President Barack Obama  
 The White House  
 1600 Pennsylvania Avenue NW  
 Washington, DC 20500

**Urgent Appeal – neonicotinoid insecticides**

Dear Mr. President,

We write to highlight a very important concern: the negative environmental and economic impacts of outdoor uses of the EPA-approved neonicotinoid insecticides: imidacloprid, clothianidin, thiamethoxam, dinetofuran and acetamiprid. On April 29, the European Union voted for a two-year suspension on major uses of the three most common neonicotinoids: imidacloprid, clothianidin and thiamethoxam. The decision came on the heels of comprehensive, peer-reviewed research conducted by the European Food Safety Authority (EFSA), which indicated that those three insecticides pose both acute and chronic hazards to honey bees and that significant gaps exist in the data needed to assess their safety. The EU decision signals the way forward for your Administration to suspend neonicotinoids in the United States.

The undersigned groups are very concerned with EPA’s past approvals of these insecticides. Agency officials have acknowledged that here, as in Europe, the original risk assessments and registration data requirements focused on acute honey bee mortality and failed to adequately consider other key risks to colony health. This means the hundreds of EPA-approved neonicotinoid products were approved based on inadequate assessments. This is unacceptable in view of the fact that honey bee pollination is a \$20 to 30 billion per year contributor to U.S. agriculture and vital to the majority of fruit and vegetable produce.

In the face of severely declining bee colonies nationally — with beekeepers reporting record losses this year — it would not be responsible to continue to allow these threatening compounds to be used so broadly. Independent scientists and commercial beekeepers attribute dramatic bee die-offs to a combination of factors, but exposure to neonicotinoids is a key contributor. We are asking you as Chief Executive to direct the EPA to follow the EU and EFSA lead and recognize the risks are unacceptably high. Pollination services provided by honey bees and the other even less-studied wild bees are far too important for agriculture, gardens and wild plants to treat them in a non-precautionary manner. Many thousands of beekeeper livelihoods, and indeed the future viability of commercial beekeeping and the crops relying on these pollination services, are potentially in jeopardy. Experts have identified the potential for “domino effects” of cascading inadequate crop pollination due to shortage of viable pollinators. This could rapidly evolve into devastating, perhaps irreversible, losses to farmers, consumers and the economy as a whole, which relies on domestically-produced bee-pollinated food and fiber crops.

In recent statements about the EU’s decision, EPA officials highlighted a recent USDA report, the *Report on the National Stakeholders Conference on Honey Bee Health - National Honey Bee Health Stakeholder Conference Steering Committee*. Unlike the peer-reviewed, scientific EFSA report, the USDA report was not peer-reviewed; it derived from a meeting of numerous stakeholders including many non-scientists. It is dated and not comprehensive. Further, there was not consensus among the stakeholders on the statements in the final report.

We would like to bring your attention to recent acknowledgments of key facts by EPA officials, made in public statements at recent meetings, in media statements, in EPA documents and other venues:

- They acknowledged EPA’s enforcement guidance for neonicotinoid use was inadequate.
- They acknowledged EPA’s bee kill incident reporting system was inadequate.
- They have stated the labels on neonicotinoid products are inadequate to mitigate adverse environmental effects, specifically to avoid seed dust-mediated mortality to honey bees and other beneficial insects in or near corn fields.
- They recognize the current corn planting machinery poses significant dust-off risks and needs changing, while also recognizing that such changes will likely take many years and stating that EPA lacks authority to mandate machinery changes.
- They acknowledge that bee health and populations, and crop pollination, are in a near-crisis state based on several synergistic factors including insecticide use.
- They indicated the agency has not consulted with the U.S. Fish and Wildlife Service on potential effects on threatened or endangered species under Sec. 7 of the Endangered Species Act for the neonicotinoid insecticides.

Despite the above, EPA has refused to exercise its regulatory power to address the one factor it could address tomorrow – the major contribution of these insecticide to bee declines – and instead has pointed to land use decisions, crop planting choices by farmers, pathogens, bee nutrition and other factors over which EPA has no authority. Indeed, no other Federal agency

has the power to help stem bee declines by addressing any of those synergistic factors within a reasonable timeframe.

We would like to further highlight a broader threat: water contamination by imidacloprid, clothianidin, thiamethoxam and the other compounds, the effect of which is to “sterilize” much of the invertebrate food chain, threatening insects, fish, amphibians and other taxa, including, but not limited to, aquatic and insectivorous birds. Recently, the American Bird Conservancy (ABC) released a report, *The Impact of the Nation’s Most Widely Used Insecticides on Birds*, researched by an internationally-recognized avian toxicologist, Pierre Mineau, who examined the key EPA risk assessment documents and found numerous failures in the agency’s approvals. The report showed high direct and indirect mortality risks to a broad suite of birds, as well as to aquatic invertebrates and ecosystems generally. It found that the observed acute threats from water contamination by EPA-approved neonicotinoids “may be totally unprecedented in the history of pesticide registration”. It also stated: “EPA has not been heeding the warnings of its own toxicologists”. Dr. Mineau examined the approved product labels and found them inadequate, stating “regulators are clearly mistaken in believing that exposure to treated seed can be minimized by label statements or adherence to good agricultural practices”. The report describes EPA’s analysis as “scientifically unsound”. It urges the agency to suspend use of these products and to ban neonicotinoid seed treatments altogether.

The leeway for your Administration to somehow disregard the ABC report was drastically reduced by the peer-reviewed publication in PLOS ONE on May 1 of this year of a major Dutch study, *Macro-Invertebrate Decline in Surface Water Polluted with Imidacloprid*. This multi-year, comprehensive, field study states (emphasis added):

*While a large amount of evidence exists from laboratory single species and mesocosm experiments, our study is the first large scale research based on multiple years of actual field monitoring data that shows that **neonicotinoid insecticide pollution occurring in surface water has a strong negative effect on aquatic invertebrate life, with potentially far-reaching consequences for the food chain and ecosystem functions.***

In short, we could face a second “*Silent Spring*” above and beyond the threats to managed and wild pollinators. Unfortunately, EPA’s planned deadline of completing its Registration Reviews for the major neonicotinoids by 2018 is far too slow in view of their potentially calamitous risks.

We trust you do not want to preside over this pending crisis. Directing EPA to follow the EU’s lead would be a first step but even more protective measures are needed, including a minimum two-year suspension for all outdoor uses of neonicotinoid insecticides pending resolution of their risks.

Thank you for your consideration of this urgent appeal. We look forward to your response.\*



Sincerely,



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CC: Tom Vilsack, Secretary of Agriculture  
Sally Jewell, Secretary of the Interior  
Nancy Sutley, Chair, Council on Environmental Quality  
Bob Perciasepe, Acting Administrator, EPA

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