

August 8, 2013

Secretary Matt Rodriguez
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

Secretary Karen Ross
California Department of Agriculture
1220 N Street
Sacramento, CA 95814

Director Brian Leahy
Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

Re: Action to protect bees

Dear Secretary Rodriguez, Secretary Ross and Director Leahy,

Since 2006 we have watched the precipitous decline of honey bees—vital pollinators, 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-harming pesticides. While 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 five years, California should rise to the occasion.

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 in California deserves attention and is, in many cases, unnecessary. Over 290,000 pounds of imidacloprid alone were used in California agriculture in 2011 on a wide variety of crops. And the insecticides are used throughout the state in homes and on lawns and gardens. However, a Purdue University research team has performed two years of field trials and found no added benefit to crops from the use of neonicotinoids.

California agriculture, including many commercial beekeepers and the agricultural economies they support, rests on bees. Almonds are entirely dependent on bees for pollination, and they support the state's almond industry valued at almost \$3 billion. Cornell University researchers put national estimates of bees' pollination services at over \$19 billion annually and USDA estimates pollinator services at \$20-\$30 billion.

This year has been 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. Those operating in California almond orchards, however, 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. 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, 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 DPR's continued approvals of neonicotinoid insecticides. Federal 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. Yet, to date, DPR has done very little to protect California bees and beekeepers.

We are calling on you to follow the lead of the EU 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:


- **Restrict, and potentially suspend, the use of neonicotinoids.** DPR should further restrict the times, methods of application, and locations in order to protect bees. In cases where bees can't be successfully protected, we urge you to suspend the use of neonicotinoid products.

- **Track all forms of neonicotinoid use, including seed treatments.** Currently, while DPR tracks most agricultural pesticide use, it does not track and report on pesticides when they are used to coat seeds.
- **Reform policies that encourage the use of neonicotinoids.** In many cases nursery owners use neonicotinoids unnecessarily in order to meet restrictions in quarantine zones or to certify nursery crops as pest-free.
- **Ensure labels are up to date.** Require a bee hazard statement on the label of all pesticides containing systemic 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.

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. California 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.*

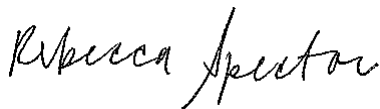
Sincerely,



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