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Subject: Docket ID Number EPA-HQ-OPP-2014-0806
Comments in Response to Pollinator Health Task Force Meeting.

This comment is submitted by the Western Integrated Pest Management Center.

Pollinator health is an important and complex issue, which requires careful consideration of the best scientific and crop production information available. Western growers need healthy pollinators in order to continue to provide the nation with nutritious fruits and vegetables for human health. Crops such as almonds, apples, kiwifruit, pears, soft stone fruit, caneberries, cucumbers and melons require healthy pollinators for high yield and quality.

Pollinator health can be challenged by lack of nutritious pollinator forage, pests and diseases, and pesticides. Domestic bees also require good management to maintain colony health. The recent years of drought in the western U.S. have significantly decreased the diversity and availability of pollinator forage. Less water means fewer flowering plants. Fewer flowering plants means less pollen. Less pollen means less protein for pollinator nutrition. Poor nutrition results in pollinators that are less able to deal with other health challenges. In domestic bees, pests and diseases are additional stressors on pollinator health. Varroa mite, small hive beetle, *Nosema ceranae*, and several bee-infecting viruses, either singly or in concert, reduce bee health. Some pesticides reduce pollinator health, either through acute toxicity or through sublethal effects. There have been highly publicized examples of bee deaths from pesticides in the west. There are also less publicized examples of growers working cooperatively with beekeepers to protect pollinators. For example, the Almond Board of California's "Best Management Practices for Using Insecticides during Bloom" reminds almond growers to "Bee Careful at Bloom."

The Environmental Protection Agency is responsible for pesticide registration. That should not mean that the only tool used to address the important and complex issues of pollinator health are pesticide regulations. I urge the Pollinator Health Task Force to consider all sound, scientific evidence related to pollinator health and crop production in order to identify practical solutions to protect both pollinator health and the ability of western growers to produce nutritious crops for human consumption.

Sincerely,



Jim Farrar, Director
Western IPM Center