

PARTNERS FOR SUSTAINABLE POLLINATION

March 10, 2008—via E-mail

Alicia Kaiser, Designated Federal Officer
Farm, Ranch and Rural Communities Federal Advisory Committee
U.S. Environmental Protection Agency
Office of the Administrator (1101A)
1200 Pennsylvania Avenue, NW.
Washington, DC 20460



RE: Petition to Include Representation of Pollinators & Pollination Perspective on EPA Farm, Ranch and Rural Communities Federal Advisory Committee Charged with the Development of a *National Strategy for Agriculture*

Dear Ms. Kaiser:

Partners for Sustainable Pollination (PFSP) urges the following actions:

1. U.S. Environmental Protection Agency (EPA) should add a representative to the Farm, Ranch and Rural Communities Advisory Committee (FRRCC) capable of providing essential information and perspectives on pollinators, beekeepers and pollination services and the role of EPA programs as they interface with this critical agricultural and natural resource input.
2. The FRRCC should consider establishing a subgroup to investigate the role of EPA programs as they interface with pollinators and pollination services.
3. Appropriate experts on pollinators and pollination services to future meetings and placed on the agenda as a resource to the FRRCC in carrying out its important charge.

Based on our review of the current committee makeup, we do not believe this important dimension of agriculture and the interface with EPA programs is represented. In particular, the FRRCC cannot adequately pursue the third stated objective in its charter— development of a constructive approach or framework to address areas of common interest between sustainable agriculture and protection of the environment—without addressing honeybee, beekeeping and other pollination issues. PFSP would be pleased to suggest highly qualified candidates to serve on the FRRCC and/or offer essential input and expertise to the FRRCC.

Honeybees, other pollinators and pollination services represent a critical component of sustainable agriculture in the U.S., by any definition. By some estimates one of every three bites consumed by humans is pollinated by honeybees or other animal pollinators. Honeybees pollinate an estimated \$15 billion of agricultural crops annually in the U.S. Direct and indirect value could total \$30 billion annually. Eighty percent of the world's flowering plants are animal pollinated, and wildlife ecosystems are vitally dependent on pollinating partners.

The importance of honeybees and other animal pollinators and the reality that they are at risk is increasingly recognized. The National Academy of Sciences released a report in late 2006 on the status of pollinators in North America. Shortly after that, Colony Collapse Disorder (CCD) hit the front page news. CCD, on top of increasing resistance of tracheal and varroa mites devastating honeybees to available miticides, habitat losses and bee poisonings from pesticide

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applications, and other factors have placed managed honeybees—and beekeepers—and their ability to provide essential crop pollination services at serious risk. Native pollinators provide pollination services to both agriculture and natural ecosystems, and we are learning they have been similarly impacted.



In the farm bill reauthorization process, Congress has recognized the importance of pollinators, and both versions of the farm bill include significant pollinator provisions in the conservation, research and specialty crops titles. Honeybees are also designated as livestock.

The U.S. Department of Agriculture (USDA) has formed a department-wide task force specifically to address CCD and other challenges. Recognizing the importance of pollinators in sustainable agriculture and healthy ecosystems, representatives of several agencies in USDA as well as the EPA's Pesticide Environmental Stewardship Program (PESP) are actively involved in the North American Pollinator Protection Campaign (NAPPC), a tri-national collaboration.

EPA's programs can and do interface with the pollinator-agriculture dynamic in a number of important ways, and actions taken by EPA in the future, both independently and in collaboration with USDA—and indeed with beekeepers, scientists and agriculture—can positively or negatively impact pollinators, beekeepers and pollination services for agriculture and ecosystems in rural America.

The most obvious interface is with EPA's office of pesticide programs—including registration and reregistration of pesticides and inerts and their impacts on honeybees and other pollinators, reregistration and reregistration of miticides used to control pests infesting honeybees, and integrated pest management (IPM) programs encouraged and facilitated by the Pesticide Environmental Stewardship Program (PESP).

EPA can also help improve communications between growers and beekeepers when pesticides are applied to minimize bee poisonings, and EPA can help identify less harmful products. EPA arguably has a responsibility to independently investigate the sublethal effects on honeybees, other pollinators and pollination services of products like neonicotinoids. Actions considered and taken by EPA on climate change and bioenergy production can also have intended and unintended consequences for pollinators and pollination services.

PFSP is a non-profit organization pursuing partner based pollination approaches founded on sound science. By working with willing landowners, farmers, beekeepers and scientists for the purpose of meeting field crop pollination needs in the United States, PFSP seeks to develop, demonstrate and validate ways to improve and increase healthy honey bee and native pollinator populations, managed and unmanaged. PFSP is headquartered in Santa Rosa, California.

I understand that the deadline for written submissions to the FRRCC for the March 13-14 meeting was March 6. Unfortunately I was unable to find time to respond in a timely manner because I was involved in preparing for and participating in a Pollinator Symposium looking at many of the same issues last weekend. I respectfully request that this communication be

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accepted late and be provided to current members of the FRRCC and be included as part of the public record. I regret that my schedule will not permit me to attend and make the case directly.

Thank you for your consideration.

Sincerely,

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