Congress of the United States
Washington, DC 20515

May 26, 2016

The Honorable Gina McCarthy
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Dear Administrator McCarthy:

We write to express our concerns regarding the Environmental Protection Agency's (EPA) *Preliminary Pollinator Assessment to Support the Registration Review of Imidacloprid* for the neonicotinoid imidacloprid, which is toxic to pollinators.

Bees and other pollinators are essential to American food production and the economy. Approximately one in three bites of food benefits from bee pollination.[1] Pollinators provide $24 billion a year to the economy, $15 billion of which is contributed by honey bees.[2] Many crops, including almonds, cranberries, and apples, rely almost entirely on bees and other pollinators.[3]

Since beekeepers began reporting massive bee die-offs more than a decade ago, the health of our nation's honey bees and other pollinators has been a continuing source of concern. In June 2014, President Obama responded by issuing a memorandum and subsequent National Strategy to Promote the Health of Honey Bees and Other Pollinators,[4] calling for a federal strategy to protect the health of honey bees and other pollinators, including the identification of existing and new methods and best practices to reduce pollinator exposure to pesticides.

In order to meet the goals of reversing pollinator losses and restoring healthy populations laid out in this strategy, EPA must strengthen and improve the scope of its risk assessment of neonicotinoids, a class of pesticides that is widely used and has been linked to declining pollinator populations.

Specifically, we encourage EPA to address the following issues:

- EPA's recent preliminary assessment for imidacloprid fails to take into account the unique risks posed to native bee species, particularly solitary ground nesting bees. Unlike honey

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[1] United States Department of Agriculture. Agricultural Research Service. 2014. *Honey Bees and Colony Collapse Disorder. Retrieved from:* http://www.ars.usda.gov/News/docs.htm?docid=15572#labs

[2] White House. Office of the Press Secretary. 2014. Creating a Federal Strategy To Promote the Health of Honey Bees and Other Pollinators. *Presidential Memorandum.* FR Doc. 2014-14946

[3] Johnson, R. & Lynne Corn, M. 2015. Bee health: Background and issues for congress. *Congressional Research Service*. 7–5700. Retrieved from: https://www.fas.org/sgp/crs/misc/R43191.pdf

[4] White House. Office of the Press Secretary. 2014. Creating a Federal Strategy To Promote the Health of Honey Bees and Other Pollinators. *Presidential Memorandum.* FR Doc. 2014-14946

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bees, roughly 70 percent of native bees nest in the ground and may be exposed to higher levels of imidacloprid through soil applications and seed treatment uses. EPA, however, only uses honey bees in their risk assessment tests. **We urge the EPA to broaden the scope of its risk assessments and evaluate and account for the specific risks posed to native bee species.**

- In addition to threats from pesticides, honey bees and other pollinators face many additional stressors, including diseases, parasites, poor nutrition, and habitat loss. **We urge the EPA to evaluate the impact of these stressors on honey bees and other pollinators in conjunction with exposure to imidacloprid or other neonicotinoids.**

- **It is critical that the EPA evaluate the risks from synergistic effects that occur when multiple pesticides are used together.** The U.S. Government Accountability Office recently noted in its evaluation, "By identifying the pesticide mixtures that farmers and pesticide applicators most commonly use on agricultural crops, EPA would have greater assurance that it could assess those mixtures to determine whether they pose greater risks than the sum of the risks posed by the individual pesticides."[5] It is clear that bees and other pollinators are exposed to numerous pesticides, not just neonicotinoids, in real field settings. A U.S. Geological Survey study found that native bees are commonly exposed to multiple pesticides. In their tests, nearly half of all native bee samples contained two or more pesticides. [6] Synergistic effects of these pesticide combinations must be evaluated in future risk assessments.

Thank you for your consideration of these concerns. The state of our nation's pollinators is directly linked to the state of our food production, the economy, and the environment.

We look forward to your response and acknowledgment of these concerns in your final risk assessment for imidacloprid at the end of the year.

Sincerely,

Earl Blumenauer
Member of Congress

John Conyers, Jr.
Member of Congress

Gerald E. Connolly
Member of Congress

Peter DeFazio
Member of Congress

[5] United States Government Accountability Office. 2016. Bee Health: USDA and EPA Should Take Additional Actions to Address Threats to Bee Populations. GAO-16-220. Retrieved from http://gao.gov/assets/680/675109.pdf

[6] Hladik M.L., Vandever M., Smalling K.L. 2015. Exposure of native bees foraging in an agricultural landscape to current-use pesticides. *Science of the Total Environment* 542 (A): 469-477

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