



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

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June 6, 2013

Sandra Romero, Commissioner
Thurston County Board of Commissioners
Building 1, Room 269
2000 Lakeridge Dr. SW
Olympia, WA 98502

Re: Response to Petition to Restrict Neonicotinoid Insecticides

Dear Commissioner Romero:

Thank you for your letter (email message) of April 8, 2013, expressing your concerns about the effect of neonicotinoid insecticides on honey bee colony health. In that letter you asked for assistance from the Washington State Department of Agriculture (WSDA) to implement a "restriction on the purchase, sale, distribution and application of the neonicotinoid class of insecticides for *ornamental use* to persons or entities with a valid WSDA pesticide applicator license" and indicated that "immediate action on a local level is appropriate and necessary." WSDA considers your letter to be a petition for rule-making. This letter is the formal response to that petition.

WSDA shares your concerns about honey bee colony health and is acutely aware of the importance of honey bees and other pollinators to the economy and the environment of Washington. In 2011, the value of the crops pollinated by bees in Washington was in excess of \$2.75 billion. Bees are also important for the pollination of fruit and vegetable gardens, as well as native plants. Certainly I am willing to take steps within my authority to protect pollinators when the evidence clearly shows that the neonicotinoid insecticides are a significant factor in their decline. I'm sure that you can understand and appreciate that I must consider the potential consequences of any rules that are adopted, and that I must make my decisions based upon sound science.

According to pollinator experts, at least 61 factors have been associated with Colony Collapse Disorder, yet none have been shown to be a definite cause. We do know that Varroa mites have a major negative impact on honey bee colony health. The potential adverse effects of sub-lethal exposure to neonicotinoid insecticides on colony health are very complex and not fully understood. In order to properly evaluate your petition, WSDA solicited the assistance and expertise of honey bee/pollinator experts at Washington State University (WSU). According to WSU staff, researchers have shown in laboratory experiments that neonicotinoid insecticides can have adverse effects that are

lethal or sub-lethal to bees, depending on the level of exposure. The sub-lethal adverse effects of neonicotinoids include impaired learning behavior, short and long term memory loss, reduced fecundity, altered foraging behavior, and motor activity of the bees. Other pesticides, including those miticides used by beekeepers for control of Varroa mites, can also have sub-lethal adverse effects on bees. There is disagreement in the scientific community about the significance of the sub-lethal effects under field conditions.

While there is potential for bees to become exposed to neonicotinoid insecticides from applications to ornamental plants, there is currently no documented evidence that the use of the neonicotinoid insecticides on ornamental plants is causing a significant adverse effect on honey bee colony health in Washington State. Because it has not been established that this use is a significant contributor to the decline of honey bee colonies in Thurston County or elsewhere in the state, the proposed use restrictions are not appropriate at this time. I understand that this is not the response that you were hoping for, but I can assure you that your petition has caught my attention and I will be watching this issue closely. I will be directing the Pesticide Management Division to monitor the results of studies that are currently in progress and take the following steps to mitigate potential risks to honey bees:

1. Urge EPA in their reassessment of neonicotinoid insecticides (esp. the nitroguanidine subclass) to fully consider whether additional use restrictions are needed to protect bees when these products are applied to ornamental plant that are attractive to bees. Also, to make users more aware of potential risks from systemic uses, request that EPA require registrants to include advisory statements on neonicotinoid labels that have systemic uses (soil drench or tree injection) on ornamental plants that are attractive to bees.
2. Independent of any required changes by EPA, request that registrants of neonicotinoid insecticides voluntarily add pollinator protection statements to their labels to address the potential risk of systemic uses on ornamental plants.
3. Request that WSU include presentations on pollinator protection in their pesticide licensing recertification courses, especially those courses that focus on urban and non-agricultural pesticide uses.
4. Provide technical assistance to all pesticide applicators who are licensed to apply insecticides to ornamental plants reminding them of their responsibility to protect pollinators.
5. Provide outreach to consumers by:
 - Assisting major retail trade organizations in creating point-of-sale brochures on pollinator protection that they can make available to their members to post at retail outlets.

- Encouraging the news media to print timely articles on pollinator protection in their home and garden sections.

In addition to the steps above, I will be looking for ways to fund and sponsor a study that could help me to more clearly evaluate the potential risks of neonicotinoid insecticides on ornamental plants.

We will continue to further evaluate this situation as more information and data become available. I thank you again for your interest and concern about this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Bud Hover". The signature is stylized and includes a long horizontal flourish extending to the right.

Bud Hover
Director