TESTIMONY OF
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U.S. ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE
HOUSE COMMITTEE ON AGRICULTURE
SUBCOMMITTEE ON BIOTECHNOLOGY, HORTICULTURE, AND RESEARCH

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Thank you Mr. Chairman.

My name is Jim Jones and I serve as the Assistant Administrator for the Environmental Protection Agency's Office of Chemical Safety and Pollution Prevention. Pollinator protection is an extremely high priority for the EPA. Over the past several years we have taken many steps to develop scientifically sound analytical techniques for assessing the potential impacts of pesticides on pollinators and have acted, based upon this science, to reduce those exposures determined to be of most significant risk. As the science continues to advance, through the registration and registration review programs, the agency will continue to work with stakeholders to put in place any additional mitigation strategies to continue to protect pollinators.

As you well know, pollinators are responsible for nearly one in every three bites of food you eat. In addition, they contribute nearly $15 billion to the nation's economy. Losses of our pollinator populations have the potential to not only threaten agricultural production, but to also threaten natural plant communities and important services provided by ecosystems.

Researchers studying pollinator health have been unable to identify a single cause for pollinator declines and have concluded that losses of honey bee colonies are likely the result of a complex interaction of a number of stressors. In May 2013, the U.S. Department of Agriculture (USDA) and the EPA released a comprehensive scientific report on honey bee health. This report synthesized the current state of knowledge regarding the primary factors that scientists believe have the greatest impact on managed bee health. These factors include: exposures to pests and pathogens; poor nutrition due to decreased availability of high quality forage; exposure to pesticides; and bee biological genetics and breeding. Each play a role in impacting managed bee health and likely also impact the health of native pollinators. It is because of these many factors, and in light of the emerging science, that in June 2014, President Obama established the Pollinator Health Task Force, co-chaired by the USDA and the EPA. In the very near future, the strategy developed by the task force will be released and is the result of a strong interagency collaboration with a focus of improving pollinator health and increasing pollinator habitat.

Of all of stressors impacting pollinators, the EPA has a role to play in two areas: first, ensuring that the new and existing products do not cause unreasonable adverse effects to pollinators; and second, registering new products for beekeepers to use in controlling hive pests such as Varroa mites. Pesticides play a critical role in agricultural production and the health of our society. If misused or overused, however, pesticides can also lead to adverse ecological and human health consequences. Congress has entrusted the EPA to balance the risks and benefits of pesticide use. Mitigating the effects of pesticides on bees, many of which are intended to kill insects, is a difficult task but is also a priority for the federal government, as both bee pollination and insect control are essential to the success of agriculture. The EPA is working to reduce bees' exposure

to pesticides without losing the ability to control pests in agriculture. Certain pesticides are also important pest management tools for beekeepers to control the Varroa mite or hive beetles. This is an inherently difficult goal to achieve since the pesticide, such as those intended to control Varroa mites on bees, essentially seek to control the mite while not harming the bee colony.

To achieve these goals, the EPA has focused its pollinator efforts in three primary areas: 1) advancing the science and understanding of the potential impact of pesticides on pollinators; 2) taking appropriate risk management actions, based upon the available science; and 3) collaborating with domestic and international partners to advance pollinator protection. Addressing potential risks associated with pollinator exposure to pesticides necessitates that a robust and scientifically supported assessment framework be in place. In January 2011, the EPA convened a workshop through the Society of Environmental Toxicology and Chemistry to explore the current state of the science on pesticide risk assessment for pollinators. Working with a cross-section of stakeholders and scientists from around the world, the outcomes from this workshop provided the scientific foundations for a new pollinator risk assessment framework. Through collaboration with our regulatory partners in Canada and the state of California, the EPA submitted these new scientific techniques to the FIFRA Scientific Advisory Panel in September 2012. Through this new framework, the EPA has identified the types of data, both hazard and exposure, that are needed to properly assess the potential impacts of pesticides on pollinators. The framework:

- relies on a tiered process;
- focuses on the major routes of exposure, including contact and dietary exposure; and

- distinguishes different types of pesticide treatments, such as compounds applied to plant leaves or seed/soil-applied (systemic) compounds.

Working through the Organization for Economic Cooperation and Development, the EPA serves as the co-chair of the Pesticide Effects on Insect Pollinators Expert Group. Working in collaboration with the International Commission on Plant Pollinator Relationships, this group is developing harmonized guidelines for conducting the studies used in the EPA's risk assessment framework. In addition, we have begun to apply this new risk assessment framework in our regulatory decision making processes, both for new registrations as well as the re-evaluation of existing registrations via the registration review program.

Taking risk management action, as supported by the science, is also a critical step in protecting pollinators. One such example is the initiative that the EPA announced in August 2013 to require new pesticide labels that prohibit the use of neonicotinoid products when bees are present. Earlier that year, the EPA had determined, based on potential effects of these compounds on honeybees and other pollinators, as well as bee kill incidents in Oregon and Canada, that when used as previously labeled, these products posed a concern for potential adverse effects on pollinators. Products bearing these new required labeling statements began to appear in the marketplace in 2014. Since then, the agency has required similar types of labeling for other products for which risks to bees have also been identified.

In addition, the EPA accelerated the re-evaluation of the neonicotinoids as part of the registration review process. Working with our regulatory partners in Canada and California, we sped up the re-evaluation schedule for this group of pesticides. The EPA also required the registrants for

these compounds to develop the necessary pollinator data, consistent with our new risk assessment framework. We plan to announce, in the near future and consistent with the directive from President Obama in his June 2014 memorandum, a further acceleration of this re-evaluation. Additionally, in early April 2015, the agency sent letters to registrants of neonicotinoid pesticides with outdoor uses informing them that the EPA will generally not be in a position to approve these applications for new uses of these compounds until new pollinator data have been submitted and more technically robust pollinator risk assessments are complete.

In October 2014, the EPA announced the public availability of a benefit analysis conducted as part of the ongoing registration review of the neonicotinoid pesticides. The agency's analysis of the benefits of neonicotinoid seed treatments for insect control in soybeans concluded that there is little or no increase in soybean yields using neonicotinoid seed treatments when compared to using no pest control at all. Consistent with the EPA's longstanding policies on public participation and transparency, we sought public input of this analysis. In addition, I personally travelled to the Mississippi Delta to meet with soybean growers to better understand their pest control needs and the role of these products in their pest management programs. We are currently in the process of reviewing the over 40,000 comments we received on our analysis. The revised analysis will be incorporated into the risk/benefit determination that we will make for these products as part of the ongoing registration review of the neonicotinoids. Additional benefits analyses for the neonicotinoid pesticides may be conducted, as needed, as part of this ongoing re-evaluation.

In March 2015, the EPA registered a new miticide, oxalic acid, to combat the devastating effects of the Varroa mite on honey bee colonies. Oxalic acid was already registered for this use in Canada and Europe. Recognizing beekeepers' need for additional registered tools to combat the Varroa mite in U.S. honey bee colonies, the EPA collaborated with the USDA on the registration. The EPA was able to expedite its evaluation in part due to a "work share" which allowed Health Canada's Pest Management Regulatory Agency (PMRA) to share their data reviews with the EPA risk assessors and risk managers. The EPA used the existing data and information from PMRA, including updated reviews of toxicity, dietary exposure, environmental fate and transport, and product chemistry data. After a thorough and priority evaluation of all the data, the EPA concurred with the conclusions and registration decision made by our Canadian colleagues and approved the registration in less than a quarter of the time it usually takes.

Finally, collaboration with domestic and international partners to advance pollinator protection is critical. Over the past three years, the EPA has co-hosted pollinator summits on several topics, including seed treatments, honey bee health, Varroa mites, and forage and nutrition. In addition, through the EPA's Pesticide Program Dialogue Committee, the EPA sought advice on how to improve pesticide labeling, increase methods for reporting bee kill incidents, expand the availability of best management practices for reducing pollinator exposure to pesticides, and develop a consistent approach for investigating bee kill incidents. In response to the advice received, the EPA has greatly improved pesticide labels for the neonicotinoids and has imposed similar labeling requirements for other pesticides that are acutely toxic to bees. We have expanded the various methods that bee kill incidents can be reported, both via the EPA's website and other mechanisms, and we worked with states to develop a more consistent approach and

guidance for investigating bee kill incidents. We also worked collaboratively with stakeholders and land grant universities to make more publically available information on best management practices for reducing pesticide exposures to bees. The President's fiscal year 2016 budget request includes additional funding for the EPA's pollinator protection efforts, including $1.5 million to further the study of acute toxicity amongst honey bee populations and to explore additional risk management options, and $500,000 to augment the work of states and tribes to develop pollinator protection plans. And, as mentioned earlier, we are working with our international partners to continue to advance the science and understanding of the potential impacts of pesticides on pollinators.

In the near future, as part of the roll out of the Pollinator Health Strategy, the EPA will soon announce additional initiatives for continuing to improve pollinator health. We will take those actions based upon the best available science and utilizing our longstanding principles of public engagement and transparency. The EPA we will also continue to work with the USDA and other federal and state agencies to protect pollinators while also ensuring that growers can meet their pest control needs in order to maintain a diverse ecosystem and provide for a healthy and abundant United States food supply.