



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

May 12, 2016

Mr. Dennis P. Vasey  
14700 Immokalee Road  
Naples, Florida 34120

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Dear Mr. Vasey:

Thank you for writing to the Environmental Protection Agency regarding concerns about potential impacts of neonicotinoid pesticides on bees. EPA Administrator McCarthy asked that I respond to you on the Agency's behalf. I want to assure you that the EPA is working aggressively to protect bees and other pollinators from the potential effects of pesticides and is engaged in national and international efforts to address those concerns.

People often ask the EPA why we do not ban pesticides that some feel are harming bees. Citing incidents that have been in the news or new studies they read about that claim cause-and-effect harm to bees from pesticide use, people want to know why the EPA does not take extraordinarily strong action and ban these chemicals. Put simply, extraordinary regulatory action requires extraordinarily robust evidence that a ban will be effective and no other action will suffice. EPA, as a federal regulatory agency, must also consider if it is appropriate to impose extraordinary actions all across the nation. EPA has not banned pesticides because the robustness of available evidence and the appropriateness of a nationwide ban fall short. The EPA's response to a 2012 petition requesting an emergency ban on clothianidin and other supporting documents in the regulatory docket for the petition<sup>1</sup> provide detailed information about these issues and the legal framework that underpins the EPA's position.

Presentation of information in the news and online can also bias public understanding of this complex topic. For example, there was a bumble bee incident in Wilsonville, Oregon, in June 2013 that grabbed headlines. While the Wilsonville incident was widely reported initially, the Oregon Department of Agriculture's investigation that identified pesticide misuse as the cause of the incident received practically no media coverage. Needless to say, it would be inappropriate for the EPA to regulate pesticides at the federal level based on initial reports of pesticide incidents. Similarly, when an investigation concludes that an incident was caused by local misuse, this is generally not a good basis for regulatory action at the national level. Along the same lines, while reports of declining bee numbers are commonly repeated online, many of those reports fail to describe the major factors of decline that have been known for decades and have nothing to do with pesticides.<sup>2</sup> Biased reports also fail to note that the number of honey-producing bee hives have been steadily increasing and were at a 20-year high in 2015.<sup>3</sup> The EPA must be very careful to honor our statutory mandate in the actions we take and the data we rely on to support those actions. Within that mandate, however, we are working very hard to advance the science of pollinator risk assessments to improve pollinator protection.<sup>4</sup>

<sup>1</sup> <http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPP-2012-0334>

<sup>2</sup> <http://www.ars.usda.gov/SP2UserFiles/Place/20800500/Bosch2001.pdf>

<sup>3</sup> <http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1191>

<sup>4</sup> <http://www2.epa.gov/pollinator-protection>

New studies on pollinators and pesticides also make headlines and exemplify the challenges we face regarding quality science. The fact of the matter is that many studies published in peer-reviewed journals or by foreign governments do not meet the EPA's scientific and/or quality standards. This does not mean that open literature studies have no value for the Agency's pesticide regulatory purposes. Rather, the EPA must always weigh new studies against the preponderance of other available data and the requirements of federal law. To that end, the Agency will conduct an open literature review as part of our registration review of the neonicotinoid pesticides,<sup>5</sup> and the studies we all read about in headlines will be included. Regarding the open literature citations you provided, our ecological effects review team indicated that the vast majority are review articles that discuss the conclusions of other original research but provide no new data to consider. However, there were several citations that we did consider and incorporate into our ongoing assessments, and several others that are in the queue for the literature screen that will inform an update to the assessments later this year.

In the neonicotinoid pesticide Web page mentioned above, if you follow the links to the docket folders you can review all of the information that EPA has posted about these chemicals and our plan to review their registrations (the work stated in those plans is currently well under way). You can also sign up for emailed alerts from the dockets, so you will be automatically notified when the Agency next posts documents for public review and comment. Submitting comments during public comment periods is the best way to ensure your position is accounted for in the EPA's final regulatory decisions.

Let me close by reiterating that, at the EPA, we are committed to effectively addressing the complex and varied stressors facing pollinators in this country. We also believe that staying abreast of evolving science,<sup>6</sup> communicating with our regulatory partners here and abroad, and working with research scientists and practitioners in laboratories and in the field put the Agency in the best position to account for potential effects of neonicotinoid pesticides on honey bees. The registration review process allows the EPA to act quickly if the data and associated scientific evaluations warrant such action. If the risk posed by a pesticide, supported by the best available, peer-reviewed science, cannot be mitigated or managed through other measures, and the Agency determines that the pesticide no longer meets the Federal Insecticide, Fungicide and Rodenticide Act standard for registration, then the EPA will move quickly to take appropriate regulatory action.

Again, thank you for taking the time to write on this important matter.

Sincerely,



Anne Overstreet  
Chief, Communication Services Branch  
Field and External Affairs Division  
Office of Pesticide Programs

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<sup>5</sup> <http://www2.epa.gov/pollinator-protection/schedule-review-neonicotinoid-pesticides>

<sup>6</sup> <http://www.ars.usda.gov/News/docs.htm?docid=15572#research>