



Pollinator Health

BEE AWARE. BE SAFE.

STATE POLLINATOR PROTECTION PLANS

To mitigate potential impacts of pesticides on pollinators and avoid “one size fits all” solutions that may miss regional or crop or use specific situations, the US Environmental Protection Agency has encouraged pesticide regulatory agencies in each state to develop pollinator protection plans. NPMA anticipates that EPA will unveil a new policy in the beginning of 2015 that will require additional pollinator protective language to be included on 60-70 active ingredients (any AI with bee toxicity. These are in addition to language that already has begun appearing on neonicotinoid labels). It is expected that this language will reference state pollinator protection plans as an alternative way to comply with the label and still protect pollinators. It may even go so far as to say that a product may not be used unless it is used in accordance with an EPA-approved state pollinator protection plan, meaning that its possible that all or some uses may be prohibited in states that do not have plans.) Some states already have pollinator protection plans in place, while others are still in the development stage. It is extremely important that the structural pest management industry is represented appropriately in these plans, and now is the time to act.

To help promote the development of state plans, EPA has asked two organizations comprised of state pesticide regulators, the American Association of Pesticide Control Officials (AAPCO) and State FIFRA Issues Research and Development Group (SFIREG) for assistance, including the development of model plans. NPMA has participated in both activities. Copies of the EPA request and AAPCO and SFIREG recommendations are attached. Among other things, the state organizations are suggesting that state lead agencies defer to industry specific best management practices.

STATE POLLINATOR PROTECTION PLANS (CONT'D.)

In summary, it is extremely likely that your state will develop a state pollinator protection plan in the upcoming months. It concerns us that:

1. The state might NOT develop a plan, which may have the effect of banning the use of certain products by PMPs, or
2. The state develops the plan; but without PMP input. This could result in plans that
 - a. fail to take into consideration that bees are sometimes the target pest,
 - b. fail to distinguish between product use patterns, treating uses that do not have the potential to impact pollinators the same as those that do (for example, requiring PMPs performing interior, termite or perimeter applications to notify beekeeper in a certain radius days in advance of the application.), or
3. The state does consider PMP uses, but does not include pest management industry BMPs.

Here's what you can do:

1. Find out the status of your state's pollinator protection plan click here: [\[link to AAPCO state plan spreadsheet\]](#)
2. Reach out the state lead agency responsible for regulating the pest management industry.
3. Get involved in the process by requesting that your state association be included as a stakeholder in the development process.
4. Review NPMA proposed BMPs
5. Contact NPMA for background or assistance (Any member of the NPMA public policy team can assist, but Jim Fredericks, NPMA's Vice-President for Technical and Regulatory Affairs is the lead on this issue. He can be reached at jfredericks@pestworld.org or (571) 224-0372.

NPMA is fully engaged in this issue at the national level, but input from state pest management associations is the most effective way to ensure that the voice of the structural pest management industry is heard during the development of state plans. NPMA is in the process of developing Best Management Practices for Protecting Bee Health. Ideally these BMPs will can be incorporated by reference into state pollinator protection plans and can be used as the foundation for how structural applications are addressed in state plans.

Please feel free to reach out to the NPMA Public Policy Team for more information or assistance if needed. As always, we stand ready to support your efforts.

