

EPA Hands the Reins to Industry on Honey Bee Decline The organic solution faces a critical decision on antibiotics

EPA's handling of the honey bee crisis is outrageous and instructive. It tells us that the only way out of the pesticide-induced environmental and public health crisis is organic.

Honey Bee Debacle

I spent the day recently with commercial beekeepers, visiting USDA and Congressional offices to talk about the honey bee crisis. Their message: (i) unprecedented numbers of bee colonies are dying, leaving the ability to pollinate the nation's food crops uncertain, and (ii) EPA must restrict neonicotinoid pesticides –the insecticides used to treat seeds that are distributed systemically through the vascular system of plants, expressing themselves indiscriminately through pollen, nectar, and guttation drops and poisoning the bees, as they pollinate or forage. We petitioned EPA to suspend the chemical's use.

EPA, with USDA, hosted an all-day industry "Pesticide Summit." Three panels were assembled: (i) mitigating risks of chemical-laden dust coming off of automated vacuum seed planters, (ii) seed treatment and coatings, and (iii) best management practices and communication. The panels were led by Bayer, Syngenta, and Monsanto, respectively. Panelists were drawn from industry and an industry-supported group, with the exception of a USDA researcher, and a commercial beekeeper.

EPA Focuses on Dust Instead of Poisonous Plants

"Fugitive dust" contaminated with deadly pesticides from seed planters that stretch across 24 crop rows invades the landscape exposing bees. However, EPA and industry's focus on risk mitigation measures, such as new seed coatings and lubricants (also not tested for hazards to the environment) to reduce dust, does not eliminate the central systemic hazard posed by the chemicals. Talc or graphite are currently used in planters to keep the sticky treated seeds from getting stuck in the planter. The equipment industry does not use filters and collection devices to capture contaminated dust because it would create a disposal problem, it says. The effect of inoculating every corn, canola, and soybean plant with deadly chemicals that create fields of poisons throughout the nation is not, in EPA's view, a concern. The one field study EPA required under a "conditional" registration in 2003 came back as inadequate four years later after EPA allowed over 90% of corn seed in the U.S. to be treated. Some European countries have issued bans and the EU is considering a wider ban, because it relies on a more precautionary approach to the question in an effort to try to protect bees before the bee crisis worsens.

Organic Solution

EPA's approach reinforces the urgency for a national transition to organic. The takeaway for organic, as it grows beyond its current \$30 billion market share, is the need for rigorous science-based decision making that requires precaution on the allowance materials in the face of scientific uncertainty. The *Organic Foods Production Act* provides the framework for doing this with the independent stakeholder National Organic Standards Board (NOSB) of environmentalists,

farmers, consumers and public input providing oversight on allowable synthetic materials in organic and policies that govern organic systems. We must keep in mind the underlying standards of the organic rule, which require that practices "maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances."

Organic is not without its controversial materials. However, a sunset provision requires a reevaluation of allowed materials on a five-year cycle in order to consider new science or methods. An article in this issue addresses a petition now before the NOSB to extend the board-established 2014 phase-out of antibiotic use in organic apple and pear production. One of the hallmarks of organic is the prohibition of antibiotics in animal production. But their use in these orchard crops was allowed to control the bacterial disease fire blight. Many, if not most, northwest growers, who produce the majority of apples in the U.S. (except those who are producing for export to the EU, which prohibits antibiotic use) proclaim the need for antibiotics until alternative materials are developed.

Any extension beyond the current 2014 expiration date, which itself was an extension on an earlier expiration date, may be extended again. Or, as is happening more frequently, phase-outs or disallowance of materials are being blocked by the White House Office of Management and Budget. Given the science on bacterial resistance associated with broadcasting antibiotics in the environment, persistence in the orchard, and subtherapeutic low dose exposure through antibiotic residues in some fruit, and the related crisis in the availability of effective medical antibiotics when urgently needed, organic standards should not allow this use. For organic to grow with credibility, it must acknowledge the science and if some read it as uncertain, which most do not in this case, then organic must err on the side of caution.

The Path Forward

The summit started with an industry-supported panelist who said that organic is not the answer and environmentalists cannot talk to farmers. In fact, organic is the key to stopping the relentless poisoning and contamination of the bees and other beneficial organisms. And, farmers and environmentalists and consumers need to sit down together, as they do on the NOSB, to create a path forward and take the reins away from toxic chemical regulators who in tandem

with chemical companies have put us on a collision course with nature and the health of future generations.

This issue of *PAY* presents the opportunities and challenges that we face in key areas.

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