

National Honey Bee Advisory Board
American Beekeeping Federation
American Honey Producers Association
Beyond Pesticides
Pesticide Action Network North America
Center for Biological Diversity

December 8, 2010

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, MC 1101A
1200 Pennsylvania Avenue NW
Washington DC 20004

Dear Administrator Jackson:

In light of new revelations by your agency in a November 2, 2010 memorandum that a core registration study for the insecticide clothianidin has been downgraded to unacceptable for purposes of registration, we are writing to request that you take urgent action to stop the use of this toxic chemical. Clothianidin is a widely used pesticide linked to a severe and dangerous decline in pollinator populations. As we are sure you appreciate, the failure of the agency to provide adequate protection for pollinators under its pesticide registration program creates an emergency with imminent hazards: Food production, public health and the environment are all seriously threatened, and the collapse of the commercial honeybee-keeping industry would result in economic harm of the highest magnitude for U.S. agriculture.

The debate on clothianidin and the neonicotinoid pesticides is not new to the agency, but the recognition of the past failure of the Office of Pesticide Program's (OPP) 2007 scientific review, now acknowledged, requires immediate action to stop use while new studies are conducted. We refer you to the memorandum entitled "Clothianidin Registration of Prosper T400 Seed Treatment on Mustard Seed and Poncho/Votivo Seed Treatment on Cotton," November 2, 2010 (see pp. 2, 4). The science that the agency has, and the independent literature find that clothianidin-contaminated pollen and nectar presents an imminent hazard. Because the hazards to honeybee health are present within registered use parameters, it is clear that label changes alone will not offer adequate protection. The issue is not one of application error, in other words. We therefore urge the agency to issue a stop use order immediately. Our nation cannot afford, and the environment cannot tolerate another growing season of clothianidin use.

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In addition, because this problem reflects an overuse of the conditional registration program in OPP, we urge you to set an immediate moratorium on the use of such registrations until the program is fully evaluated for compliance with its underlying statutory responsibilities. The conditional registration of clothianidin in 2003 with outstanding data critical to its safety assessment represents a failure that could and should have been avoided. Clearly, the impacts on pollinators were not adequately evaluated prior to the issuance of the conditional registration, despite knowledge of "chronic toxic risk to honey bee larvae and the eventual instability of the hive." This is the case with pollinator protection and a host of other issues that have direct bearing on environmental protection and public health.

In redoing the clothianidin study and evaluating the causes of Colony Collapse Disorder and the larger issue of the pollinator decline crisis, we urge you to establish protocol that fully assesses the complexities that come together to threaten the honeybees. To be fully protective of bees, reviews must consider multiple chemical and cumulative exposures, persistence, and synergistic effects. We can no longer rely on studies of individual chemicals in isolation.

Thank you for your attention to the pollinator crisis and efforts to stem the tide of contamination and poisoning. We look forward to your reply.

Sincerely,

National Honey Bee Advisory Board
Steve Ellis.
Secretary

American Beekeeping Federation
David Mendes
President

American Honey Producers Association
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cc Steve Owens, Assistant Administrator, Office of Chemical Safety and Pollution Prevention
Steven Bradbury, Director, Office of Pesticide Programs