

Public comments received at the February 8, 2017 meeting of the Governor's Committee on Pollinator Protection

Comments from Margot Monson of St. Paul, MN

In the first paragraphs there are references to taking "*immediate action*", and that "*this is a high level report rather than a detailed plan*". I believe we do need the details now, because we are definitely experiencing documented pollinator declines in both honey bee colonies and native insect diversity, so we do need to take immediate action. I believe that this was the intention of Governor Dayton's Executive Order.

PP1-2:

In the statement about tracking pollinators through the Minnesota Wildlife Action Plan, with updates only every 10 years, it would seem this is not often enough to be able to analyze critical information and make changes, if necessary.

P3-4:

IV Callout box: Research in MN:

Major topics:

* "*The effectiveness and risks of insecticides... in ag systems and threats to monarchs*" - There are literally dozens of research studies which many of us sent to the Commissioners Frederickson and Woldman and about which they communicated with Gov Dayton, which inspired his EO. The research is there!

* *Knowledge of "diversity, abundance, range, and phenology of native pollinators"* is so critical to establishing base line ecological information. However, this kind of research takes years to complete, so the immediate action steps needed to restore pollinator health cannot be dependent on this research.

P5:

Goal 1: Lands throughout MN support healthy, diverse, and abundant pollinator populations:

There is plenty of land available for pollinator habitat, but we need to raise the caps on CRP to put more land in conservation

P6: What are we doing?

BWSR suggestions for establishing pollinator habitat are great, but are there funds for seed mixes and maintenance?

P7:

BMPs are the buzz words for land management and so very important, but does the DNR have funds to oversee educating land owners and implementation of the BMPs required for the land they manage?

Future actions

I Promote, Protect, Restore....

Most of the future actions outlined require funds we currently do not have

II Purposely manage state roadsides.....in more than one meeting with officials of the DOT that oversee roadside vegetation, we learned that although their job may be to purposely manage state roadsides to maintain infrastructure while also supporting pollinators, they do not have adequate funds, staff, nor ability to actually enforce the regulations.

P9:

VI Commercially raised bumble bees and monarchs

This practice has already caused diseases in bumble bees and we do not know if *Bombus impatiens*, the species used commercially, has not already contributed to diseases in the populations of our wild native species. It is not worth the risk.

Raising monarchs for public use, potentially harms a species already with dangerously low populations.

Goal 2: Judicious use of pesticides

The overuse and inappropriate use of pesticides has encouraged the development of genetic resistance in pest populations. In addition to the prevalence of large scale use of pesticides in commercial agriculture, this is also quite prevalent in urban residential landscapes and very often also in commercial horticulture. With diverse perennial native plantings, non-invasive perennials, and careful selection of annuals from pesticide free sources, the insects that evolved with the native plants, including predators, thrive, and a natural landscape that benefits pollinators is possible without the use of insecticides and other chemicals. There should be restrictions on the availability of chemicals toxic to pollinators on hardware, big box, and garden store shelves - most merchants and gardeners are ignorant of the harm these products cause to pollinators.

In agricultural settings, neonicotinoids and other systemic pesticides should be restricted and their use permitted only with adherence to strict IPM strategies and with current *science backed economic thresholds specific to the pest organism's life cycle*.

P10:

Since pesticide drift is illegal, it must be eliminated by restricting of the use of seeds treated with systemic pesticides where they are ineffective in increasing yield. Since many seeds are purchased outside MN, there is the need to track these purchases to better enforce regulations for their use. In addition, the current use of neonicotinoid seed treatments or foliar sprays for soybean aphids is not supported by science because in most cases there is little or no difference in soybean yields from fields treated vs those untreated. (Neonicotinoid Seed Treatments to Soybean Production. EPA 2016; DiFonzo. 2016. Soybean Aphid Thresholds.

P11

II: Verification of Need

How is the MDA going to be "*increasing inspections for pesticides that are highly toxic to pollinators*" ? Do we already have enough certified inspectors? Is this in the budget?

Future Actions

5. Where is there ever "*appropriate use of neonicotinoids for homeowners and residential users*"? Given the many peer reviewed scientific research papers that document harm to pollinators, where is the evidence that systemic pesticides are ever appropriate in residential settings?

P12:

1. Using IPM to reduce crop loss in MN

In addition to the environmental conditions, parasites, disease, and competition for food and space factors listed as influencing pest populations, it *should definitely include the lack of diversity in crops, the extensive monocultures* that cover what once was a robust landscape with healthy populations of native insects, birds, and other examples of MN wildlife.

P13

Goal 3: Minnesotans understand value, and actively support pollinator populations

Although it looks responsible for stores to identify plants as "pollinator friendly", merchants *must actually know that the plants they sell were sourced from places that did not use systemic pesticides in their propagation methods*. From experience I have learned that most garden centers and even some nurseries *do not grow all their plants from seeds* but buy from other sources, and many are selling chemically pretreated plants that are coming from outside the US. Consumers deserve to know exactly what they are buying, and merchants must be held to higher standards than mere labels that say their plants are "pollinator friendly".

In collecting "*data from over 300 nurseries*", will this include systemic pesticides other than the neonicotinoids, which are just one class of systemic pesticides? Any systemic pesticide may end up in the pollen and nectar.

P 16:

Callout box: Pollinator Protection in the Private Sector

I believe it is inappropriate to use the names of businesses, utilities, or non-profits as promoting pollinator protection because this is misleading - not all are advocating methods that *entirely* beneficial to our pollinators.

Overall, I believe that the IPPT repeats much information that every single committee member should already know by now concerning pollinator function and decline, pesticide action and its impacts, and this does not need more discussion. If this committee is to actually accomplish anything, it must move us quickly to the "immediate action" the Governor's EO directs. Although it proposes, suggests, advocates, and focuses on where agencies "can make changes", we really have all the research and information we need to justify mandating meaningful changes *right now*. This committee must come up with those action steps that begin now, so this Spring changes are put into immediate effect. Not only is it best for restoring pollinator health, but it is our moral responsibility as good stewards of this environment to see that this happens under our watch and Gov Dayton's order.

Thanks you for the opportunity to add my comments,

Sincerely,

Margot Monson, MS Entomology, beekeeper

Comments from Laurie Schneider of Stillwater, MN

INTERAGENCY POLLINATOR PROTECTION TEAM REPORT (IPPT). The IPPT report seems to focus on projects already in place. This long narrative is absent of “action plans” (except for the Dept. of Agriculture’s contribution) and loses sight of the main mission of the executive order.

Future IPPT documents should be action driven. I suggest each agency complete a questionnaire of sorts corresponding directly to the Governor’s Pollinator Protection Executive Order. For instance, the Department of Transportation is directed to *create, protect and enhance pollinator habitat*. The DOT would provide an action plan, with specific goals and completion dates. The commissioner or director of each agency should be responsible for the completion of this questionnaire, so that staff put significant time and energy towards creative solutions to *create, protect and enhance pollinator habitat*.

REMOVE the green callout box on page 16. The endorsement of any product, service, business or enterprise should not be “advertised” or featured on a government or state document. Listing private industry on this state document poses a conflict of interest and opens the door to influence outcomes.

MOTIVATE STATE AGENCIES TO ACT: In my work with state, county and local communities, it’s clear that direction needs to come from the top. Middle tier staff, managers and operators cooperate only if directed to do so. The DOT, for instance, is in a position to make significant changes to practices that can increase habitat for pollinators. These managers may be understaffed or feel stuck in the middle without proper direction or authority from the top; meanwhile the operators under their supervision, resist change. Neither the operators or managers want to create more work. If the managers are not empowered from the top to direct the operators under their supervision to change practices or policies, it won’t happen. The commissioner or director needs to be involved and ultimately responsible for implementing pollinator protection actions and motivating staff to participate for each agency.

For example: The Dept. of Transportation can adjust their current practices to benefit pollinator habitat including mowing 6 feet instead of the current 15 feet, and identify stretches that require no mowing. Additionally, New York State implemented a successful Adopt-a-Roadside program, like a program Minnesota once tried. The Minnesota program can be revived for pollinator habitat. State monies can be awarded for roadside restoration through Minnesota counties. Counties work more closely with landowners and local organizations such as conservation districts and environmental groups. These groups can apply for an “adopt a roadside” grant to plant or restore habitat; this can include ROW’s. New York State restored significant amounts of roadside habitats with this program. Citizens and businesses can also fund a roadside through this program.

UTILITY RIGHT OF WAY MANAGEMENT (ROW): Utility ROW managers should cease use of broadcast insecticides, and all systemic insecticides, and be required to provide an updated inventory of pesticides annually. Current practices and pesticides should be reviewed to be sure they are using least toxic options and best practices for pollinators. There is potential for significant improvement to practices for pollinators through closer monitoring of utility ROW management.

SUGGESTIONS FOR MAJOR GOALS OF COMMITTEE:

- Implementation of a cease on neonicotinoid insecticides on agricultural lands beginning with soybeans. In most cases, soybean yields do not increase with neonic treatments. DiFonzo 2016 Soybean Aphid Thresholds. Michigan State U of Dept of Entomology.
- Empower staff at state agencies to develop creative solutions and programs for pollinator protection, utilizing the commissioner or director of each agency to motivate; followed with real action plans including completion dates. Specifically, the Dept. of Transportation.
- Counties require annual pesticide inventory and best practices update from utility ROW management contractor. This should be reviewed and updated to insure best practices for pollinators.
- Adopt a roadside for pollinator habitat grant program. State provides a grant fund to counties. Minnesota counties award grants to local organizations such as watershed, conservation district, environmental groups and others. These groups “adopt a roadside” to restore for pollinator habitat. This program can also solicit funds from businesses to adopt a roadside.

THIS IS A MORAL ISSUE: I’ve been involved with organic farming all my life. Pastures and meadows are missing lightening bugs, bumble bees, butterflies and other pollinators. Important insects are disappearing along with predators that keep pests in check. The natural balance is disrupted. Protecting our world is more than a scientific or political issue, this is a moral issue and a health issue. The science is already there to prove this. It’s our moral responsibility to protect our land, environment and pollinators. This critical situation needs to be addressed now and it’s the right thing to do.

Thank you,

LAURIE SCHNEIDER Co-Executive Director of POLLINATOR FRIENDLY ALLIANCE

Comments from Jeff Anderson

As a very concerned Commercial Migratory Beekeeper/ stakeholder, I have been closely watching the progress of the Pollinator Committee. I know several of the persons serving, and have had multiple conversations concerning the discussions to date, and current trajectory. I understand that at the most recent meeting, that you have offered to accept public comments, here are mine!

I feel compelled to start by pointing out what should be obvious. The Governor appointed this committee specifically to improve pollinator protection based nearly entirely on the outcome of the Department of Ag's review of neo-nics. The Department reviewed >300 scientific papers before determining that the use of these pesticides in Minnesota are in fact a problem for pollinators, and that corrective action must be taken.

Syngenta's release of their biased Corporate studies to the committee and the responses they elicited while enlightening, should not have been allowed into a protection discussion. The members of this committee were not chosen for their great understanding of scientific studies; nor were they chosen to rebut the conclusions of Minnesota Department of Ag's registration review. The Committee was chosen to recommend policies to protect pollinators in Minnesota based on existing harm, determined by the Department. Syngenta's mudding this Committee's discussion with science contradicting MDA's findings should not be allowed, Syngenta should be instructed to take to take their beef up with MDA directly.

I understand the reason for forming an Interagency Task Force to create a unified effort, however, the Task Force has inappropriately steered efforts into the promotion of pollinators, when in fact the Governor announced the intention as “protection” of pollinators.

The proposed planting of additional forage and using honey production as a metric to measure the outcome are both way off the Committees formation for Pollinator PROTECTION.

Even if the committee decides to ver into mostly into promotion instead of protection, honey production is still way to variable a metric. A far better metric is dead or alive, thankfully NASS has started compiling this information in the form of quarterly surveys. Because of the extreme migratory nature of Minnesota's commercial beekeepers, particularly the 1st quarter stats have little value, however because all the bees arrive back and are counted in the 2nd quarter, and fall migration does not start until 3rd quarter is complete, stats from these quarters give very useful information. Additionally besides asking for the number of colonies lost, they also ask about hives rebuilt. These numbers could easily be compared between years and get a very accurate picture if efforts are reducing bee mortality or not.

I have attached a one pager (xyz) which I think will help with the committees understanding of production vs direct mortality for use as a metric.

If the Committee decides to actuall talk about pollinator protection, one has to review the recent EPA Policy Announcement.

<https://www.regulations.gov/document?D=EPA-HQ-OPP-2014-0818-0477>

Key is 'suggested removal' from all labels of the

“Do not apply this product or allow it to drift to blooming crops or weeds if bees or other pollinating insects are visiting the treatment area.”

This is the only Mandatory protection language for pollinators on current labels, its removal would make killing pollinators fair game to anyone that cares to do it. Historically MDA has simply approved whatever EPA approves. States however can require labeling that is more restrictive than Federal for pesticides sold within their jurisdiction.

I strongly recommend that the Committee request that MDA labeling people explain to the Committee what the field relevant implications are of removing the “Do not apply” language from labels. I further suggest having MDA comment on whether they intend to accept labels with no Mandatory pollinator protection for use in Minnesota, or if they will insist on keeping the mandatory language intact.

Thanks in advance for the Committees consideration of these thoughts.

Respectfully

Jeff Anderson

Commercial Migratory Beekeeper

Attached document (xyz, referenced above) from Jeff Anderson

My comment on draft 2 is very short. The Draft is COMPLETELY off target. The Governor's charge for this committee is Pollinator Protection, not pollinator promotion. Every aspect of the Interagency report is basically an advertisement for how their agency can best spend the \$1.5 million dollar pie which they anticipate the MDA will produce. The only useful part of the report is creating a metric of success.

While it is very important to have a metric to measure success, the choice of the metric is hugely important. While it makes perfect sense to 'count' natives, it makes very little sense to use honey production as the measure for managed honeybees. Annual honey production is HIGHLY variable. Here are the last 5 years of Minnesota Production as reported by NASS

<http://usda.mannlib.cornell.edu/usda/nass/Hone//2010s/2016/Hone-03-22-2016.pdf>

2012 8,448,000 lbs
2013 6,360,000 lbs
2014 8,375,000 lbs
2015 7,540,000 lbs
2016 7,920,000 lbs

If 2017 happened to be similar production year to 2013, it would look like Minnesota's Pollinator efforts are a disaster, if we have a good production year and produced over >10,000,000 lbs which was common in the 1990s, it would be considered a glowing success, neither would be an accurate picture...

A far more accurate metric would be to use NASS's quarterly bee loss survey(s).

<http://usda.mannlib.cornell.edu/usda/current/BeeColonies/BeeColonies-05-12-2016.pdf>

This adds some light to the issue.

State	January 1 number of colonies	January-March					
		Maximum colonies ¹	Lost colonies	Percent lost ²	Added colonies	Renovated colonies ³	Percent renovated ⁴
Minnesota	28,000	74,000	3,700	5	690	530	1
State	April 1 number of colonies	April-June					
		Maximum colonies ¹	Lost colonies	Percent lost ²	Added colonies	Renovated colonies ³	Percent renovated ⁴
Minnesota	71,000	125,000	12,500	10	20,000	21,000	17
State	July 1 number of colonies	July-September					
		Maximum colonies ¹	Lost colonies	Percent lost ²	Added colonies	Renovated colonies ³	Percent Renovated ⁴
Minnesota	133,000	136,000	32,000	24	640	2,300	2
State	October 1 number of colonies	October-December					
		Maximum colonies ¹	Lost colonies	Percent lost ²	Added colonies	Renovated colonies ³	Percent renovated ⁴
Minnesota	104,000	105,000	10,000	10	600	40	(Z)

One can get a sense of MN's managed bee losses, and when they occur. Note the Draft indicates that 15% annual loss is considered 'normal', this chart shows 49% total / annual loss, further it identifies late summer is by far and away the largest loss period, 24%, (pesticide application/expression season). Foliar applications and plant expressions of systemic pesticides in pollen and nectar of forage plants. The Governor's Executive order implied that 'fixing' this was to be job one for his Public Pollinator Protection Committee... The Interagency Task Force is completely ignoring Pollinator Protection, instead their focus is planting flowers and grabbing the \$1.5 million dollars of newly generated 'Protection money' to do it.