



June 20, 2013

President Barack Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Urgent Appeal – neonicotinoid insecticides

Dear Mr. President,

We write to highlight a very important concern: the negative environmental and economic impacts of outdoor uses of the EPA-approved neonicotinoid insecticides: imidacloprid, clothianidin, thiamethoxam, dinetofuran and acetamiprid. On April 29, the European Union voted for a two-year suspension on major uses of the three most common neonicotinoids: imidacloprid, clothianidin and thiamethoxam. The decision came on the heels of comprehensive, peer-reviewed research conducted by the European Food Safety Authority (EFSA), which indicated that those three insecticides pose both acute and chronic hazards to honey bees and that significant gaps exist in the data needed to assess their safety. The EU decision signals the way forward for your Administration to suspend neonicotinoids in the United States.

The undersigned groups are very concerned with EPA’s past approvals of these insecticides. Agency officials have acknowledged that here, as in Europe, the original risk assessments and registration data requirements focused on acute honey bee mortality and failed to adequately consider other key risks to colony health. This means the hundreds of EPA-approved neonicotinoid products were approved based on inadequate assessments. This is unacceptable in view of the fact that honey bee pollination is a \$20 to 30 billion per year contributor to U.S. agriculture and vital to the majority of fruit and vegetable produce.

In the face of severely declining bee colonies nationally — with beekeepers reporting record losses this year — it would not be responsible to continue to allow these threatening compounds to be used so broadly. Independent scientists and commercial beekeepers attribute dramatic bee die-offs to a combination of factors, but exposure to neonicotinoids is a key contributor. We are asking you as Chief Executive to direct the EPA to follow the EU and EFSA lead and recognize the risks are unacceptably high. Pollination services provided by honey bees and the other even less-studied wild bees are far too important for agriculture, gardens and wild plants to treat them in a non-precautionary manner. Many thousands of beekeeper livelihoods, and indeed the future viability of commercial beekeeping and the crops relying on these pollination services, are potentially in jeopardy. Experts have identified the potential for “domino effects” of cascading inadequate crop pollination due to shortage of viable pollinators. This could rapidly evolve into devastating, perhaps irreversible, losses to farmers, consumers and the economy as a whole, which relies on domestically-produced bee-pollinated food and fiber crops.

In recent statements about the EU’s decision, EPA officials highlighted a recent USDA report, the *Report on the National Stakeholders Conference on Honey Bee Health - National Honey Bee Health Stakeholder Conference Steering Committee*. Unlike the peer-reviewed, scientific EFSA report, the USDA report was not peer-reviewed; it derived from a meeting of numerous stakeholders including many non-scientists. It is dated and not comprehensive. Further, there was not consensus among the stakeholders on the statements in the final report.

We would like to bring your attention to recent acknowledgments of key facts by EPA officials, made in public statements at recent meetings, in media statements, in EPA documents and other venues:

- They acknowledged EPA’s enforcement guidance for neonicotinoid use was inadequate.
- They acknowledged EPA’s bee kill incident reporting system was inadequate.
- They have stated the labels on neonicotinoid products are inadequate to mitigate adverse environmental effects, specifically to avoid seed dust-mediated mortality to honey bees and other beneficial insects in or near corn fields.
- They recognize the current corn planting machinery poses significant dust-off risks and needs changing, while also recognizing that such changes will likely take many years and stating that EPA lacks authority to mandate machinery changes.
- They acknowledge that bee health and populations, and crop pollination, are in a near-crisis state based on several synergistic factors including insecticide use.
- They indicated the agency has not consulted with the U.S. Fish and Wildlife Service on potential effects on threatened or endangered species under Sec. 7 of the Endangered Species Act for the neonicotinoid insecticides.

Despite the above, EPA has refused to exercise its regulatory power to address the one factor it could address tomorrow – the major contribution of these insecticide to bee declines – and instead has pointed to land use decisions, crop planting choices by farmers, pathogens, bee nutrition and other factors over which EPA has no authority. Indeed, no other Federal agency

has the power to help stem bee declines by addressing any of those synergistic factors within a reasonable timeframe.

We would like to further highlight a broader threat: water contamination by imidacloprid, clothianidin, thiamethoxam and the other compounds, the effect of which is to “sterilize” much of the invertebrate food chain, threatening insects, fish, amphibians and other taxa, including, but not limited to, aquatic and insectivorous birds. Recently, the American Bird Conservancy (ABC) released a report, *The Impact of the Nation’s Most Widely Used Insecticides on Birds*, researched by an internationally-recognized avian toxicologist, Pierre Mineau, who examined the key EPA risk assessment documents and found numerous failures in the agency’s approvals. The report showed high direct and indirect mortality risks to a broad suite of birds, as well as to aquatic invertebrates and ecosystems generally. It found that the observed acute threats from water contamination by EPA-approved neonicotinoids “may be totally unprecedented in the history of pesticide registration”. It also stated: “EPA has not been heeding the warnings of its own toxicologists”. Dr. Mineau examined the approved product labels and found them inadequate, stating “regulators are clearly mistaken in believing that exposure to treated seed can be minimized by label statements or adherence to good agricultural practices”. The report describes EPA’s analysis as “scientifically unsound”. It urges the agency to suspend use of these products and to ban neonicotinoid seed treatments altogether.

The leeway for your Administration to somehow disregard the ABC report was drastically reduced by the peer-reviewed publication in PLOS ONE on May 1 of this year of a major Dutch study, *Macro-Invertebrate Decline in Surface Water Polluted with Imidacloprid*. This multi-year, comprehensive, field study states (emphasis added):

*While a large amount of evidence exists from laboratory single species and mesocosm experiments, our study is the first large scale research based on multiple years of actual field monitoring data that shows that **neonicotinoid insecticide pollution occurring in surface water has a strong negative effect on aquatic invertebrate life, with potentially far-reaching consequences for the food chain and ecosystem functions.***

In short, we could face a second “*Silent Spring*” above and beyond the threats to managed and wild pollinators. Unfortunately, EPA’s planned deadline of completing its Registration Reviews for the major neonicotinoids by 2018 is far too slow in view of their potentially calamitous risks.

We trust you do not want to preside over this pending crisis. Directing EPA to follow the EU’s lead would be a first step but even more protective measures are needed, including a minimum two-year suspension for all outdoor uses of neonicotinoid insecticides pending resolution of their risks.

Thank you for your consideration of this urgent appeal. We look forward to your response.*

Sincerely,



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CC: Tom Vilsack, Secretary of Agriculture
Sally Jewell, Secretary of the Interior
Nancy Sutley, Chair, Council on Environmental Quality
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