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OPP Docket  
Environmental Protection Agency  
Docket Center (EPA/DC), (28221T)  
1200 Pennsylvania Ave NW  
Washington DC 20460-0001  
Attention: Docket ID No. EPA-HQ-OPP-2014-0818

**Re: Docket ID: Federal Register Notice, EPA-HQ-OPP-2014-0818, “Proposal To Mitigate Exposure to Bees From Acutely Toxic Pesticide Products”**

The US Canola Association (USCA) writes to submit comments in response to the Environmental Protection Agency’s (EPA) request for stakeholder input (Federal Register Notice, EPA-HQ-OPP-2014-0818) regarding the Agency’s proposal to “adopt mandatory pesticide label restrictions to protect managed bees under contract pollination services from foliar application of pesticides that are acutely toxic to bees on a contact exposure basis.”

The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. Since USCA’s establishment in 1989, the Association has facilitated the growth of domestic canola acreage from zero to over 1.5 million acres in 2015. Virtually all of this acreage is planted with hybrid seed, making canola’s seed-stock production one of the many crops that require and rely on the pollination services provided by honey bees, and the USCA is committed to ensuring the health of pollinators and honey bees.

As a result, the USCA is a founding member of the Honey Bee Health Coalition (HBHC) and supports its mission to “collaboratively implement solutions that will help to achieve a healthy population of honey bees while also supporting healthy populations of native and managed pollinators in the context of productive agricultural systems and thriving ecosystems.” One of the four key focal points of the HBHC is helping to promote the further implementation of best management practices (BMPs) when the use of insecticides are necessary to control pests.

The USCA is very concerned that the proposed label restriction, if implemented without including the ability to apply insecticides during bloom using BMPs, could substantially limit the production of hybrid canola seed in the United States, or even drive the production of seed to other countries. Canola plants during bloom are susceptible to severe damage from a number of insect pests, including the alfalfa looper, aphids, cabbage seedpod weevil, clover cutworm, diamondback moth, grasshoppers, and lygus bugs. Infestations of these insects when present during bloom have been controlled successfully without major harm to pollinating bees by using BMPs that include: (1) crop monitoring to ensure insecticides are only applied when the economic threshold justifies use; (2) communications with beekeepers prior to application to

allow hive movement if necessary, or covering the hives if they cannot be moved; (3) timing the application to late in the evening or early in the morning when the bees are not active or present in the canola; (4) observing climatic conditions such as wind direction to avoid drift towards the hives; and (5) using insecticides that have the least toxicity to honey bees but are sufficiently toxic to control the target insect pests.

USCA is also concerned that the proposal may not allow for aerial applications of insecticides during flowering, which should be allowed during the early morning or late evening timeframes when bees are not active or present in the canola.

As noted above, canola hybrid seed production requires and relies on the pollination services of honey bees. Hybrid seed producers can use up to 2-1/2 hives per acre of canola. Indeed, the pollination services provided by beekeepers can be the most expensive cost in producing the hybrid seed, and can exceed \$195 per planted acre. It is nonsensical to impose label restrictions based on the assumption that hybrid seed producers would pay such high costs for the needed pollination services of honey bees only to spray an insecticide on the crop indiscriminately without first carefully considering and ensuring the safety of the honey bees.

The USCA strongly urges that the proposed label restrictions include the ability to use, if necessary, insecticides during bloom using BMPs to prevent harm to the honey bees being used for pollination services.

Respectfully yours,



Jeff Scott  
President, U.S. Canola Association