



January 20, 2016

Mr. Dave Scott  
Office of Indiana State Chemist  
Purdue University  
175 S. University St.  
W. Lafayette, IN 47907-2063

Dear Mr. Scott:

Thank you for the opportunity to provide comments on the Indiana Pollinator Protection Plan. We greatly appreciate your commitment to bee health and to an open public process for the development of your managed pollinator protection plan (MP3).

We believe your plan does a good job of including all stakeholders and accounting for the multiple factors that can affect pollinator health. Here, we have several suggestions we hope you will consider as you finalize your state plan.

Indiana's plan is balanced and suggests realistic solutions to a very complex issue. We support the goals you outline in your MP3 draft and appreciate your recognition that pollinator health is a multi-faceted issue with multiple stakeholders. We agree the scope of the plan should include managed bees because of their importance to agriculture and their clear relationship to commercial beekeepers and growers as stakeholder groups.

However, we are concerned about expanding the plan's scope to include unmanaged bees, and we suggest you to limit it to only commercially managed bees. We believe focusing the plan on bees in agricultural settings will make the greatest contribution to bee health. Given the enormous contribution commercial hives make to the food system in Indiana and nationally, the scope of the plan should be narrowed to address issues affecting commercially managed pollinators, rather than both managed bees and wild pollinators. Since little is known about wild pollinator health, it would be difficult to measure the plan's impact on wild pollinators. We suggest the plan should reflect this with a focus on managed bees used in agriculture.

Given the State Department of Agriculture's involvement in Indiana's MP3 development, it makes sense that the focus of the plan would be on beekeeping for agriculture. The State Department of Agriculture is tasked with supporting commercial agricultural operations rather than hobby endeavors, such as gardening or backyard beekeeping. While hobbyists may still be considered beekeepers, the circumstances of hobbyists' colonies vary significantly from those of commercially kept colonies, and hobbyist beekeepers often have less experience managing hives. As a result, hobbyists will need more thorough guidance and accountability than what can be offered in the state's pollinator plan. Hobbyist beekeepers who maintain small numbers of hives and do not use their bees to provide contract pollination services should be recognized outside of the state managed pollinator protection plan in state extension educational materials. The state extension program can do additional outreach to interested hobbyist beekeepers just as they do with other non-commercial agricultural activities such as gardening, and the state MP3 can address agricultural beekeeping operations.

We are also concerned the recommendation for a pollinator awareness zone does not account for the circumstances of urban applications, and we suggest you alter the recommendation so that it only applies to agricultural areas. Even if urban applicators must only notify beekeepers with hives on immediately adjacent properties, it is still a substantial burden for applicators and homeowners who may choose to make applications without significant advance planning. While having a pollinator awareness zone may work well in agricultural settings, we ask you to consider the full implications of such a recommendation.

Regarding measurement, we suggest you consider taking up metrics measuring the effectiveness of the plan rather than other factors that can affect bee health. Gains or losses in bee health are attributable to many factors, not only pesticide use. As a result, we support using behavioral changes that increase pollinator protection as the primary measure of success. Mechanisms for changing stakeholder behavior are already readily evident in the plan as best management practices for growers, applicators, and beekeepers. As a result, measuring changes in behavior will measure the plan's effectiveness rather than changes in extraneous factors, such as weather, that may also affect bee health.

Thank you for reviewing our comments and for your commitment to pollinator health. We are eager to assist as stakeholders in any further discussions of the Indiana state managed pollinator protection plan, so please contact us if you have any questions or need further input from the pesticide registrant community.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Hobbs". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Aaron Hobbs  
President

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RISE is a national not-for-profit trade association representing more than 220 producers and suppliers of specialty pesticide and fertilizer products to both the professional and consumer markets. RISE member companies manufacture more than 90 percent of domestically produced specialty pesticides used in the United States, including a wide range of products used on lawns, gardens, sport fields, golf courses, and to protect public health.