



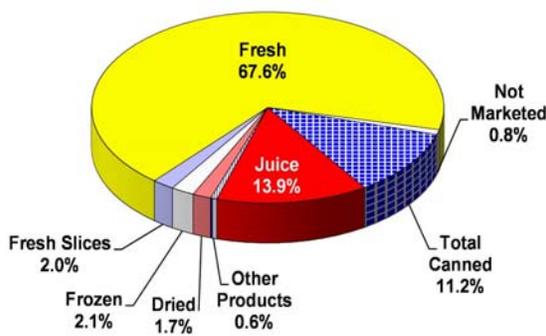
November 19, 2014

OPP Docket
 Environmental Protection Agency Docket Center
 (EPA/DC), (28221T)
 1200 Pennsylvania Ave. NW
 Washington, DC 20460-0001.

Re: EPA-HQ-OPP-2014-0806
“Pollinator Health Task Force”

The U.S. Apple Association (USApple) is the national trade association representing all segments of the domestic apple industry. USApple’s members include state and regional apple associations representing 7,500 apple growers throughout America, as well as more than 400 individual firms involved in the apple business. USApple welcomes this opportunity to provide comments to the Environmental Protection Agency (EPA) on the mission and activities of the Pollinator Health Task Force (Task Force).

The United States is the world’s second largest producer of apples, behind the People’s Republic of China. With a USDA estimated farm gate (wholesale) value of more than \$3 billion in 2013¹, apples are the third most valuable fruit produced in the U.S behind only grapes and all citrus. Nearly 68 percent of the crop goes to the fresh market, with 32 percent utilized for processed apple products (**Figure 1**). Roughly 29 percent of the 2013 U.S. fresh apple crop was exported with a value of more than \$1 billion² (**Figure 2**). Apples are grown in every state in the U.S., but are grown commercially in 29 states.



Source: USDA, National Agricultural Statistics Service.

Figure 1 – Utilization of the 2013 U.S. Apple Crop

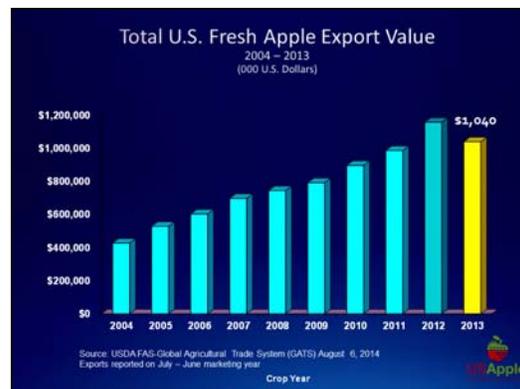


Figure 2 – U.S. Fresh Apple Exports 2004-2013

¹ USDA, National Agricultural Statistics Service, Noncitrus Fruits and Nuts Summary July, 2014

² USDA Foreign Agricultural Service Global Agricultural Trade System (GATS) August 2014



Apples are among a relatively small number of food crops that are totally dependent upon insect pollination.³ Many apple growers keep and maintain their own bee hives. As such, the U.S. apple industry has an important stake in the issues associated with pollinator health. As a member of the Pollinator Protection Working Group (PPWG) created by EPA's Pesticide Program Dialog Committee (PPDC), the apple industry is keenly aware of the need to better understand the threats to pollinators and the development of sound methodology to mitigate them.

The widely publicized issue of managed bee colony "decline" often referred to as Colony Collapse Disorder (CCD) has generated significant discussion and attention by beekeepers, agricultural interests, researchers and public interest groups. In some cases, calls for regulatory actions such as greatly restricting, or even banning certain classes of insecticides have been made before all the factors surrounding CCD are fully understood. In May, 2013, the U.S. Department of Agriculture (USDA) and the EPA released a scientific report⁴ on honey bee health arising from a conference of scientists and stakeholders held the previous November. The report states that multiple factors play a role in honey bee colony declines, including parasites and disease, genetics, poor nutrition and pesticide exposure. The science to date appears to indicate that there is not a single "culprit" involved in CCD, yet some have seized upon just one of the five factors listed in the report – pesticides – and push for regulatory actions that are not supported by the underlying science.

USApple has consistently supported a science based regulatory approach to crop protection chemical registration. We are concerned that the loud volume of those calling for a ban on the use of neonicotinoid insecticides may overrun the science based evaluation called for under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), and result in unintended negative consequences.

An example of a possible unintended consequence of the removal of neonicotinoids from the plant protection compounds available to growers can be found in apples. Apples are subject to attack by more than 100 insect pests and diseases. Even a small amount of insect damage to the fruit can render it unsuitable for the fresh market, causing the fruit to be diverted to processing use where it yields the grower only about one third of the value of fresh market fruit. A newly invasive pest, the Brown Marmorated Stink Bug (BMSB) has emerged as a threat not only to apples and other tree fruit, but a multitude of agricultural crops.⁵ In 2010, a sudden surge of the BMSB population in 6 Mid-Atlantic states resulted in an average 20 percent loss (worth \$37 million) of the fresh apple crop in the affected states alone according to a survey done by USApple.⁶

The BMSB can be controlled by a very limited number of pesticides, including endosulfan and the neonicotinoid dinotefuran. The registration for endosulfan has been cancelled effective in July 2015, so it will no longer be available for use against the BMSB. Dinotefuran received a Section 18 emergency use label in those states where BMSB has been documented as a threat to the apple crop for use as a late season (6 months past bloom) pre harvest treatment for BMSB. Since 2010, the BMSB has spread to 41 states.⁷ With the large number of crops that the BMSB has been shown to attack, the lack of an effective treatment such as dinotefuran could result in crop losses in the hundreds of millions of dollars. The BMSB example alone underscores the great need for a careful,

³ USDA Insect Pollination Of Cultivated Crop Plants, McGregor 1976

⁴ Report on the National Stakeholders Conference on Honey Bee Health - National Honey Bee Health Stakeholder Conference Steering Committee

⁵ USDA ARS SCRI Grant, "Biology, Ecology, and Management of Brown Marmorated Stink Bug in Orchard Crops, Small Fruit, Grapes, Vegetables, and Ornamentals"

⁶ USApple BMSB Loss Estimate on 2010 Crop

(2011<http://wolf.house.gov/sites/wolf.house.gov/files/documents/FINAL%20Mid%20Atlantic%20Apple%20Loss%20Estimate%20Letter%20to%20Tracy%20Leskey.pdf>)

⁷ Op. Cit.

thoughtful, thorough scientific approach to understanding and addressing the multiple factors associated with CCD. The current science does not at all support such a drastic action as cancellation of the registration of neonicotinoids. The example of the removal of a neonicotinoid as a tool against the BMSB is only one of many examples that could be drawn when considering the myriad of damaging insect pests for which neonicotinoids represent an effective treatment. In that broader context, the action to remove the whole class of pesticides could have an extremely serious effect on the U.S. food and fiber industry.

As noted earlier, USApple has consistently supported a science based regulatory approach to crop protection chemical registration. Producing a crop totally dependent upon insect pollination, apple growers as a group are a major stakeholder in the work being done by the Pollinator Health Task Force and share the goal of better understanding the problem of pollinator decline as a whole. We strongly urge the Task Force to use a science based approach that encompasses all of the identified causes for pollinator decline and utilizes the knowledge gained to support what appears likely to be a multi-faceted solution encompassing bee nutrition, stewardship, parasite and pathogen control, habitat, and genetics in promoting a vital and healthy pollinator community.

Sincerely yours,

A handwritten signature in black ink that reads "Mark W. Seetin". The signature is written in a cursive style and is positioned above the typed name and address.

Mark W. Seetin
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