COMMONWEALTH of VIRGINIA

Department of Agriculture and Consumer Services

Sandra J. Adams
Commissioner

PO Box 1163, Richmond, Virginia 23218
Phone: 804/786-3501 • fax: 804/371-2945 • Hearing Impaired: 800/828-1120
www.vdacs.virginia.gov

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RE: Request for Stakeholder Input – Virginia's State Managed Pollinator Protection Plan

Dear Stakeholders:

In June of 2014, federal departments and agencies were tasked with taking new steps to reverse pollinator losses and help restore pollinator populations. As part of this effort, the U.S. Environmental Protection Agency (EPA) was directed to engage state agencies for pesticide regulation in the development of state pollinator protection plans as a means of mitigating the risk of pesticides to bees and other managed pollinators. The Virginia Department of Agriculture and Consumer Services (VDACS), which is the state lead pesticide agency, therefore embarked on laying the framework for Virginia's Managed Pollinator Protection Plan (Plan). VDACS is now seeking stakeholder input in development of the Plan. The final Virginia State Managed Pollinator Protection Plan will be developed based upon the input received from stakeholders and taking into consideration the feasibility and cost effectiveness of each component of the Plan.

Virginia's proposed State Managed Pollinator Protection Plan is a voluntary, proactive approach which focuses on enhanced communication and coordination between agricultural producers, landowners, pesticide applicators and beekeepers as a means to further protect pollinators. It will be intended to reduce the potential for pesticide exposure to managed bees that are adjacent to, or near a pesticide treatment site. The Plan will not be intended to prohibit, eliminate, or further restrict the application of pesticides.

The Virginia State Managed Pollinator Protection Plan will be limited to managed pollinators not under contracted pollination services at the site of application and includes both agricultural and non-agricultural (i.e. turf and ornamental pest control) pesticide applications as well as commercial and noncommercial beekeepers. For the purposes of the Virginia State Managed Pollinator Protection Plan, the term "managed pollinators" includes any species of pollinators that are managed by humans for pollination purposes, the production of honey, beeswax, or other products. Managed pollinators are primarily honey bees (*Apis mellifera*), but could include other species of bees, such as alfalfa leafcutting bees (*Megachile rotundata*), alkali bees (*Nomia melanderi*), mason bees (*Osmia lignaria*) and some species of bumble bees (*Bombus impatiens*). It

is anticipated that mitigating the risk of pesticides to managed pollinators will also reduce risk to native bees and other pollinators as well.

Stakeholder Participation

The input of all stakeholders is vital to the success of Virginia's State Managed Pollinator Protection Plan. To facilitate the exchange of information, VDACS will hold seven meetings (listening sessions) at various locations throughout Virginia. The purpose of the listening sessions is to: (i) provide an overview of the EPA's guidance to state lead pesticide agencies in developing state pollinator protection plans, (ii) seek input from stakeholders on the critical elements that should be included in Virginia's Plan and (iii) provide an overview of the critical elements VDACS is proposing for inclusion in the State Managed Pollinator Protection Plan.

Critical Elements of a Virginia Plan

Bees may be exposed to pesticides via drift, flying to and foraging in the treatment site, or flying through treatment sites to nearby foraging areas. The Virginia State Managed Pollinator Protection Plan should promote the use of the Best Management Practices (BMP) which will reduce the potential for pesticide exposure to managed bees that are adjacent to or near a pesticide treatment site. One key component of the Virginia State Managed Pollinator Protection Plan is timely and voluntary communication and coordination among beekeepers, agricultural producers, landowners, and pesticide applicators. The proposed elements listed below align with guidance from the EPA and reflect the use of BMPs, including those which will serve to enhance communication.

1. **Best Management Practices for Protection of Pollinators**
    a. Agricultural Producers
        BMPs – TBD
    b. Landowners
        BMPs - TBD
    c. Pesticide Applicators
        BMPs - TBD
    d. Beekeepers
        BMPs - TBD

2. **Location of Managed Pollinators** - Agricultural producers, landowners and pesticide applicators need accurate and timely information on the location of nearby colonies if they are to communicate with beekeepers regarding pesticide applications. Therefore, a critical element of the Virginia State Managed Pollinator Protection Plan is an effective method by which agricultural producers, landowners and pesticide applicators are able to identify and locate managed colonies near a treatment area. VDACS is seeking input from stakeholders regarding:
    a. <u>Method</u> for agricultural producers, landowners and pesticide applicators to identify the location of managed bee colonies near a treatment area. Methods to identify location of bee colonies may include:

i. Apiary Registry
ii. Online Mapping
iii. Physical Identification
iv. Personal Communication
v. Other

b. Minimum information agricultural producers, landowners and pesticide applicators need to accurately identify managed bee colonies near a treatment area:
   i. GPS location (longitude/latitude)
   ii. Physical Address
   iii. Other (Example: voting precinct, zip codes etc).

c. Minimum defined distance from the pesticide treatment area inside which agricultural producers, landowners and pesticide applicators should identify the location of managed bee colonies and communicate anticipated pesticide applications to beekeepers:
   i. ½ mile
   ii. 1 mile
   iii. 2 miles
   iv. Other

3. **Communication with Beekeepers** – Once aware of the location of managed hives near a treatment area, agricultural producers, landowners and pesticide applicators should contact beekeepers to provide information prior to any pesticide applications. When considering communication options, agricultural producers, landowners and pesticide applicators should keep in mind that beekeepers need a reasonable amount of time to determine what, if any, action they may want to take to protect their colonies. (Example: moving colonies temporarily to a protected location or temporarily netting hives). VDACS is seeking input from stakeholders on the following:
   a. Contact information needed to inform beekeepers of an anticipated pesticide application:
      i. Name & Address
      ii. Email
      iii. Phone Number
      iv. Other
   b. Time period for communication regarding an anticipated pesticide application to all beekeepers with managed colonies within the defined distance from pesticide treatment area:
      i. 24 hours
      ii. 48 hours
      iii. Other

4. **Potential Locations for Apiaries** - Beekeepers need accurate information regarding areas where pesticides may be used in order to determine locations for placing beehives. Therefore, a critical element of the Virginia State Managed Pollinator Protection Plan is an

effective method by which beekeepers are able to identify and locate potential areas for placing bees. VDACS is seeking input from stakeholders regarding:

a. Method for beekeepers to identify the potential locations to place managed bee colonies:
    i. Online Mapping
    ii. Other
b. Minimum information beekeepers need to accurately identify potential locations to place managed bee colonies:
    i. GPS location (longitude/latitude)
    ii. Physical Address
    iii. Other

5. **Communication with Agricultural Producers, Landowners and Pesticide Applicators -** Once aware of the potential locations to place managed hives, beekeepers need a way to contact agricultural producers, landowners and pesticide applicators to determine if any pesticide applications are planned prior to deciding to place their bees at or near that location. VDACS is seeking input from Stakeholders on the following:
    a. Contact Information needed for the beekeeper to contact the agricultural producers , landowners, and pesticide applicators:
        i. Name & Address
        ii. Email
        iii. Phone Number
        iv. Other

Stakeholder Listening Sessions

VDACS invites all interested stakeholders to participate in these listening sessions and provide their comments related to The Virginia State Managed Pollinator Protection Plan. Meetings will be held from 6:00 – 8:00 PM as follows:

Date	Service Area	Meeting Venue
Tuesday, January 26, 2016	Warrenton	John Barton Payne Community Room 2 Courthouse Square Warrenton, VA 20186
Thursday, January 28, 2016	Roanoke	South County Library 6303 Merriman Road Roanoke, VA 24018
Monday, February 01, 2016	South Hill	Southern Piedmont Agriculture Research and Extension Center (AREC) 2375 Darvills Road Blackstone, VA 23824

Wednesday, February 3, 2016	Charlottesville	Virginia Department of Forestry 900 Natural Resources Drive Charlottesville, VA 22903
Thursday, February 4, 2016	Richmond	Tuckahoe Area Library 1901 Starling Drive Henrico, VA 23229
Monday, February 22, 2016	Suffolk	Tidewater Agriculture Research and Extension Center (AREC) 6321 Holland Road Suffolk, VA 23437
Wednesday, February 24, 2016	Eastern Shore	Painter Agriculture Research and Extension Center (AREC) 33446 Research Drive Painter, VA 23420

Written comments may also be emailed to PollinatorProtection@vdacs.virginia.gov or mailed to VDACS at:

VDACS – Office of Pesticide Services
PO Box 1163
Richmond VA 23218

Should you have any questions or need additional information, please contact:

Liza Fleeson Trossbach, Program Manager
Office of Pesticide Services
liza.fleeson@vdacs.virginia.gov
804-371-6559

Keith Tignor, State Apiarist
Office of Plant Industry Services
keith.tignor@vdacs.virginia.gov
804-786-3515

Thank you in advance for your participation and I look forward to receiving your input on Virginia's State Managed Pollinator Protection Plan.

Sincerely,

Sandra J. Adams
Commissioner

cc: Charles Green, Deputy Commissioner
Liza Fleeson Trossbach, Program Manager, Office of Pesticide Services
Keith Tignor, State Apiarist, Office of Plant Industry Services