



February 10, 2015

Mike Stebbins
Office of Science and Technology Policy
Executive Office of the President
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear Mr. Stebbins:

Re: Request for CEQ to revisit landscape guidance as it pertains to honeybees and other pollinators.

Dear Mr. Stebbins,

We respectfully request that you review our comments and suggestions below and ask that CEQ reconsider a few of the statements included in the “Supporting the Health of Honey Bees and Other Pollinators” addendum to “Guidance for Federal Agencies on Sustainable Practices for Designed Landscapes.”

THE GREEN INDUSTRY

AmericanHort was formed in 2014 by the consolidation of the American Nursery & Landscape Association and OFA – The Association of Horticulture Professionals. With a combined history of over 220 years, AmericanHort supports nearly 16,000 member and affiliated businesses that include breeders, greenhouse and nursery growers, garden retailers, distributors, interior and exterior landscape professionals, florists, students, educators, researchers, manufacturers, and all of those who are part of the industry market chain.

SAF, a national trade association representing the floriculture and greenhouse industry, includes 10,000 small business members: growers, wholesalers, retailers, importers and related organizations, located in communities nationwide and abroad. The industry produces and sells cut flowers and foliage, foliage plants, potted flowering plants, and bedding plants, which compete in the international marketplace.

In terms of scope and impact, our industry comprises roughly one-third of the annual production value of specialty crops, and 10 percent of total U.S. crop production. The horticulture industry's production, wholesale, retail, and landscape service components have annual sales of \$163 billion, and sustain over 1,150,000 full- and part-time jobs.

SPECIFIC CONCERNS

As we stated in our comments to the White House Task Force in late 2014, AmericanHort and SAF appreciate the seriousness of the challenges facing pollinators and beekeepers. We applaud the Administration for assembling the task force. Our industry has established a strong and ongoing effort to work within the industry and with other crop groups, beekeeper organizations, and the chemical registrant community to identify new management practices and opportunities for partnering to help alleviate some of the habitat/forage and pesticide pressures that pollinators face.

However, we are concerned that some of the guidance recommendations provided in the ‘pollinator’ addendum are largely unachievable by industry, as they are not reflective of federal and state regulatory requirements and do not account for the significant pest challenges that our segment of agriculture faces. The statements from the addendum that are of particular concern are:

- *“Acquire seeds and plants from nurseries that do not treat their plants with systemic insecticides.”* (bullet #5, pg. 15)
- *“Care should be taken to source plant material from suppliers that can verify no insecticide treatments to their nursery stock. Insecticides can persist in plant material (leaves, flowers, nectar, and pollen) and lead to disruptions in a pollinator lifecycle once planted in the pollinator habitat.”* (bullet #5, pg. 22)

Nearly every state requires a grower to obtain a nursery license to operate and requires a regular inspection by a state regulatory official to confirm that the grower is meeting the standards described in the license. These licenses typically include the following statement regarding the nursery inspection results,

“had been found [by the inspector] to be apparently free from all injurious insects or plant diseases.” (example from New York State, Division of Plant Industry, Article 14).

This level of pest control generally requires that pesticide applications be made to control pest populations. Without them, a nursery would not be able to maintain its license.

Furthermore, nursery operations in more than half of the continental United States must deal with federal and state regulated pests (e.g., Asian Longhorned Beetle, Emerald Ash Borer, Hemlock Woolly Adelgid, Japanese Beetle). To deal with these issues and ship material from a regulated area or across state lines federal and state regulations typically require that the plants be treated with an insecticide and growers must show records of the application.

It is important to keep in mind that pesticides are a cost to the horticulture industry and would not be used if there were not a need to control invasive and endemic pest concerns. Recommending that plant material be sourced only from suppliers that can “verify no insecticide treatments” is not a viable recommendation and could influence some growers to take greater risk and potentially spread problematic and invasive pests and disease on federal properties.

Another topic of concern is the expansionist definition used for Integrated Pest Management (IPM) in the addendum. The definition of IPM in the addendum begins with,

“a sustainable approach to managing pests by combining biological, chemical, cultural, mechanical and physical tools in a way that minimizes economic, health, and environmental risks,”

which is also the definition adopted by the U.S. Congress in 1995. However, the addendum continues the definition and includes,

“IPM places an emphasis on the reduction of pesticide use and the implementation of preventative and alternative control measures.”

While we generally agree that reduction of pesticide use is a good thing, altering a legislatively adopted definition to highlight one perspective of IPM above other considerations is not appropriate and is not reflective of the intent of IPM. Risks and benefits must be taken into consideration when making these decisions and the CEQ language suggests otherwise.

We respectfully suggest that the addendum be edited in a manner that would define IPM as described in the initial sentence of the definition only. Furthermore, we ask that the guidance regarding sourcing plant material from growers that have not used insecticides or systemic insecticides be removed and replaced with statements encouraging the sourcing of plant material from growers who have adopted an IPM program in their plant production practices.

Thank you for your time and consideration of this issue. We would appreciate the opportunity to work with you and your staff on future projects. We share the Administration’s concerns about pollinator health and believe that there is a significant opportunity for industry and government to work together to find solutions to the challenges pollinators face. However, success will be based upon, and improved by, recognition of all of the challenges and opportunities we face together.

Sincerely,



Joseph Bischoff, PhD
Regulatory & Legislative Affairs
Director
AmericanHort



Lin Schmale
Senior Director Government
Relations
Society of American Florists

Cc:

EPA: Ron Carleton, Ag Advisor to EPA Administrator McCarthy

USDA: Krysta Harden, Deputy Secretary of Agriculture