



October 17, 2015

Richard Ball, Commissioner  
New York State Department of Agriculture and Markets  
10B Airline Drive  
Albany, NY 12235

Dear Commissioner Ball,

New York Farm Bureau (NYFB), the State's largest general agricultural advocacy organization, is pleased to offer the following comments on the proposed Pollinator Protection Plan Best Management Practices (BMPs) as a member of the State's Pollinator Task Force. Overall, NYFB believes that any BMP incorporated in the State's Pollinator Protection Plan should be based on good scientific research to ensure that both farmers and beekeepers are implementing practices that will have a positive impact on pollinator health. We would recommend that in additional research continue to be conducted to ensure farmers and beekeepers be implementing the best BMPs possible.

*NYFB additions to the BMPs are in blue.*

## **Pollinator Protection – Best Management Practices (BMPs) – Notes & Comments**

### **Landowner/Grower BMPs**

#### **Issue – Selecting the appropriate location for hives.**

**BMP** - Consider your land-use practices when working with beekeepers to locate hives.

#### **Issue – Lack of pollinator forage and habitat.**

**BMP** - Leave pollinator-friendly plants in non-production areas.

**BMP** - Establish buffer zone between pesticide-treated areas and pollinator habitat – the extent of the buffer zone will differ when applied to native vs. managed pollinators.

**BMP** - Establish a field border in accordance with the NRCS Field Border 386 Standard. Landowners should contact their local NRCS office or Soil and Water Conservation District for assistance in implementing a field border. Landowner should consider applying for EQIP funds for financial assistance in implementing pollinator BMPs.

**BMP** - Landowner should consider enrolling land in CRP through the Farm Service Agency and in consultation with their local NRCS or SWCD offices.

#### **Issue – Over-reliance on pesticides as the primary means of pest control may cause problems.**

**BMP** - Use Integrated Pest Management. Landowners should contact their local Cornell Cooperative Extension for assistance with implementing operation-specific IPM practices.

**BMP** - Agronomists and crop consultants should consider pollinator impacts when making pesticide recommendations.

**Issue – Misuse of pesticides.**

**BMP/Law** - Use registered pesticides according to the label requirements.

**Issue – Pesticide applications may occur during times of peak pollinator activity.**

**BMP** - When possible, apply pesticides early morning or in the evening.

**BMP** - Develop a pest management plan that considers the likelihood of bees foraging during bloom.

**Issue – Unannounced pesticide applications can cause problems.**

**BMP** - When beekeeper information is available, notify them prior to pesticide application.

**BMP** - Develop a formal agreement with the beekeeper.

**Issue – Pesticides being used unnecessarily or the product being used is more powerful than necessary for the situation.**

**BMP** - Choose products with lower risks to pollinators.

**Pesticide Applicator BMPs**

**Issue – Over-reliance on pesticides as the primary means of pest control may cause problems.**

**BMP** - Use Integrated Pest Management [with advice and education from a NYS IMP expert](#).

**Issue – Misuse of pesticides.**

**BMP** - Use registered pesticides according to the label requirements.

**Issue – Pesticide applications may occur during times of peak pollinator activity.**

**BMP** - When possible, apply pesticides early morning or in the evening.

**BMP** - Factor in crop bloom when selecting and applying pesticide products.

**BMP** - Avoid applying pesticides when lower temperatures will allow dew formation.

**Issue – Unannounced pesticide applications can cause problems.**

**BMP** - When beekeeper information is available, notify them prior to pesticide application.

**BMP** - Use an interactive mapping system that allows applicators to determine hive locations prior to applications.

**Issue – Pesticides being used unnecessarily or the product being used is more powerful than necessary for the situation.**

**BMP** - Choose products with lower risks to pollinators (i.e. granular and liquid).

**BMP** - Avoid pesticides that are applied as dusts and wettable powders.

**Beekeeper BMPs**

**Issue – Poorly placed hives or moving hives from one area to another can cause problems for beekeepers and neighboring landowners.**

**BMP** - Notify landowners, applicators and neighboring landowners when placing hives and when moving hives from one location to another.

**Issue – Moving hives during peak flight times when bees are away from the hives.**

**BMP** - When possible, restrict hive movement to times when it is more likely that bees will be in their hives.

**Issue – Beekeepers placing hives without landowner permission.**

**BMP** - Obtain landowner permission for hive placement every year and keep in contact with the landowner.

**BMP** - Work with growers to reach written agreements providing permission to place hives in agricultural areas.

**Issue – Hives not clearly marked can cause problems for applicators, landowners and neighbors.**

**BMP** - Ensure hives are clearly visible [or place signage on the hives to let individuals know who to contact if there is an issue with the hives.](#)

**Issue – Varroa Mites**

**BMP** - Control the mite levels to be no more than 3.0/bee and conduct monthly monitoring of mite levels.

**BMP**- [Contact the Cornell Honey Bee Extension Associate or the NYS Apiculturist for assistance and recommendations on controlling Varroa mites.](#)

**Issue – American Foulbrood**

**BMP** - Monitor hives for American Foulbrood, apply treatment when necessary, and have routine hive inspections.

**BMP**- [Contact the Cornell Honey Bee Extension Associate or the NYS Apiculturist for assistance and recommendations on controlling American Foulbrood.](#)

**Issue – Small Hive Beetle**

**BMP** – Monitor hives for Small Hive Beetle and apply treatments as necessary.

**BMP** – Consult the Cornell Honey Bee Extension Associate or the NYS Apiculturist for assistance and recommendations for controlling Small Hive Beetle.

**Issue – Pesticides may cause damage to colonies on a temporary basis.**

**BMP** - Provide clean areas in front of colonies to enable monitoring of bee losses on a regular schedule – bare ground makes it easier to see dead bees near the colony.

**BMP** - Cover colonies as appropriate prior to pesticide applications. Keep covered as necessary (for locally based, stationary colonies). [NYFB has heard concerns that this practice requires very specialized netting and in some cases, the bees will run into the netting trying to get out of the hive and can injure or kill themselves. More study or input from the bee industry may be necessary.](#)

**BMP** - Report all suspected pesticide-related bee kills to the State pesticide program at DEC and to the Apiary program at Agriculture and Markets.

**BMP**- [Beekeepers should educate landowners on the impacts that pesticides could have on bee colonies and develop an agreement with the landowner outlining when pesticides may be spread and what the landowner can do to prevent harming pollinators.](#)

**Issue – Honeybee colonies have more difficulty withstanding longer periods of pesticide exposure.**

**BMP** - Maximize the number of months during the normal bee season when bees are not exposed to pesticides. Reduce the months of potential exposure to pesticides to be less than the months of non-exposure.

**Issue – Juvenile colonies are put into pollination before they have the strength to withstand the environmental stress.**

**BMP** - Beekeepers need to provide full strength colonies to withstand the rigors of pollination.

**Issue – Placement of colonies near commercial food crops raises the risk of damage to colonies caused by pesticides.**

**BMP** - When possible, move colonies away from crops after pollinating the crops. The flight distance of three to five miles is the distance colonies should be moved to minimize exposure.

**BMP** - Keep hives ready to relocate quickly and have a plan that includes how and where to move them.

**BMP** - Remove bees when 90% of flowers on the latest bloom are at petal fall. Past this point, no pollination is taking place and bees that forage outside the orchard will have a higher risk of contacting insecticide-treated crops.

**Issue – Identifying location of hives.**

**BMP** - State registration program or self-reporting the location of hives.

**BMP** - Complete and submit New York State Department of Agriculture & Markets' (DAM) Honey Bee Health Information Form. This form collects contact and colony location information from beekeepers so DAM can make them aware of bee health issues as they arise.

### **State Agency BMPs**

**Issue – Need for improved pollinator habitat on roadsides, rights of way and other State-managed lands.**

**BMP** - Use Integrated Vegetation Management practices – including, chemical, biological, cultural, mechanical, and/or manual treatments to control problem plants and promote low-growing, desirable vegetation.

**Issue – Lack of quality bee forage areas.**

**BMP** - Offer for sale pollinator-friendly seed kits that could be used by highway crews instead of grass seed.

**Issue – State contracts do not consider pollinator protection.**

**BMP** - Include pollinator protection language in state procurement contracts.

**Issue – Need to identify where bee hives are located.**

**BMP** - Develop a registry for documenting beehive locations and for making beehive-operator contact information available for applicators/growers. The registry could be managed by DAM, Cornell or a beekeeper association.

**BMP** - Develop an interactive New York State mapper that allows applicators to determine hive locations prior to applications. Consistent with the above recommendation, this map could be managed by DAM or Cornell or a beekeeper association.

**BMP-** State Apiculturist could meet with the beekeeper clubs around the state to educate beekeepers on the state apiary laws, how to properly manage hives of all sizes, and to encourage beekeepers to complete NYSDAM's Honey Bee Health Information Form.

**Issue – Need to identify the relative toxicity of pesticide products to bees. (Federal)**

**BMP** - Develop an alternative pesticide matrix for comparing the relative toxicity of various pesticide products to bee populations.

**Issue – Need to raise awareness of pesticide applicators regarding pollinator protection issues.**

**BMP** – Have applicator license exams cover the topic of pollinator protection.

### **General BMPs**

**Issue – Understand and adopt Integrated Pest Management.**

**BMP** - Continue to do outreach to beekeepers, farmers, and land managers on IPM BMPs. Continue and enhance funding levels for IPM.

Practitioners should establish a balanced IPM management plan – using all the tools in the toolbox, including pesticides where necessary.

**Issue – Need to include the public at large in the effort to improve pollinator health – including native pollinators.**

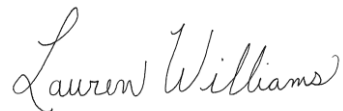
**BMP** - Provide guidance for homeowners on landscape BMPs on way to create better pollinator habitat.

**BMP-** Educate the general public about the benefits of bees and not to fear them.

Overall, NYFB wishes to stress the importance of not dividing the agricultural community and effectively pitting producers against beekeepers. It is important for the agricultural community as a whole, including beekeepers and agricultural producers, to work together for BMPs that will bring both groups together to confront the issues and find solutions that work for all parties.

New York Farm Bureau appreciates the opportunity to comment on the New York State Pollinator Protection Plan Best Management Practices and looks forward to future opportunities to comment on the State's Pollinator Protection Plan as we strive to develop comprehensive solutions that improve pollinator health, while ensuring pollination services and a variety of crop production tools remain available for New York farmers. .

Sincerely,



Lauren Williams  
Assistant Director of Public Policy