



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656 • www.nyfb.org

August 26, 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 New York State Pollinator Protection Action Plan as a member of the State's Pollinator Task Force. NYFB represents farmers in virtually every sector of agricultural production, including crops that rely upon bees for pollination services. We also include in our membership beekeepers who provide pollination services. New York Farm Bureau members value the role that pollinators play in the agriculture industry and are committed to taking science-based steps to protect the health and viability of bees, birds, butterflies, and other pollinating insects.

NYFB believes the New York State Pollinator Protection Action Plan, when properly devised and implemented, will be an essential tool in facilitating communications between farmers and beekeepers, educating each other about sensitive pesticide issues, informing local stakeholders about voluntary pollinator-related efforts, and assisting state agency staff in directing state-wide programs to protect pollinator health.

There are numerous factors that affect bee health, including hive management, habitat loss, environmental exposure, extreme weather conditions, hive pests, such as *Varroa* mites which are becoming resistant to available control products, and insect diseases. Combined, these problems have made beekeeping especially challenging in recent years. It is critical that the Task Force comprehensively consider all these factors in order to determine the plan to improve bee health.

Agricultural producers rely upon pest control products in order to manage their crops and often protect their crops from catastrophic losses. NYFB believes that consumers benefit when farmers prevent high-quality food, fiber, and energy from being destroyed by pests, ensuring that agricultural products are available and affordable. While NYFB members strongly believe that farmers need pest control products, NYFB members also support and advocate for robust actions to maintain and improve pollinator health, including, science-based pesticide label instructions and mitigation; identifying and promoting best management practices (BMP) for crop production and bee hive management; practical, focused research on pesticides and pollinators; science-based risk-management strategies to address the multiple stressors impacting pollinator health; and stewardship and promotion of those strategies.

Continued science-based research efforts at institutions like Cornell University is extremely important for developing best management practices for pollinator health but also for developing best management practices for agricultural producers as well. NYFB supports education and training for beekeepers on best management practices to ensure access to the newest beekeeping methods and techniques. Continued education is also needed for farmers using pesticides, because if used improperly, pesticides could have unintended impacts not only on bees but on beekeepers' livelihoods.

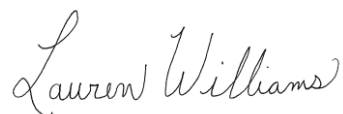
NYFB suggests development of a coordinated and comprehensive research program to determine the impacts of current agricultural practices that would better define the specific areas where mitigation efforts are needed. Such a research effort should take into account the impacts created by regional cropping patterns as well as the impact of husbandry practices by the bee keeping community.

New York Farm Bureau encourages the Task Force to consider the findings, considerations, and goals found in the *National Pollinator Health Strategy* recently released by the Presidential Pollinator Health Task Force. The strategy creates a coordinated federal approach to protecting pollinator health with three overarching goals, including, reducing honey bee colony losses during winter to no more than 15% within 20 years; increasing Eastern population of the monarch butterfly to 225 million butterflyed; and restoring and enhancing 7 million acres of land for pollinators over the next 5 years through Federal, State, and public-private partnerships.

The most important 'piece of the puzzle' to pollinator protection is good communication among farmers, applicators, industry, regulators, and bee keepers. Similarly, the interactions of producers and beekeepers are critical. Beekeepers providing pollination services not only rely upon agricultural producers for their livelihood but expect producers to act in a way that does not damage their colonies. Agricultural producers have a vested interest in protecting their crop and in assuring that pollinators are not harmed. NYFB wishes to avoid 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 in confronting these issues and finding solutions that work for all parties.

New York Farm Bureau appreciates the opportunity to comment on the New York State Pollinator Protection Action Plan and looks forward to future opportunities to participate with the State's Pollinator Task Force 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,

A handwritten signature in cursive script that reads "Lauren Williams".

Lauren Williams
Assistant Director of Public Policy