November 24, 2014

RE: Pollinator Health Task Force; Notice of Public Meeting

Docket Identification Number: EPA-HQ-OPP-2014-0806


The Entomological Society of America (ESA) would like to thank you for your leadership of the Pollinator Health Task Force and for the opportunity to provide comments. ESA applauds federal efforts to understand and mitigate declining pollinator populations, and we are glad to see that research and extension are acknowledged as critical components of addressing this issue. We greatly appreciate the high-level recognition of the importance of pollinator health by the Administration, and we thank the interagency Task Force for working collaboratively on this challenge.

ESA looks forward to learning the details of the forthcoming National Pollinator Health Strategy and the accompanying Research Action Plan. ESA would welcome the chance to partner with the Pollinator Health Task Force and would like to offer assistance with the release and implementation of the Strategy next year. There are a number of activities ESA can provide in support of the Task Force and the National Strategy:

ESA can help facilitate the distribution of the Strategy to a broad scientific audience.

- ESA can serve as a convener, bringing together the scientific and regulatory communities to review and discuss pollinator health issues. Summits can be organized by ESA to review the complete landscape of current, reputable research as well as to identify critical gaps in knowledge.

- ESA publishes a number of high-quality, peer-reviewed journals, including *Environmental Entomology*, the *Journal of Economic Entomology*, and the *Journal of Insect Science*. To provide a compendium of the latest pollinator health studies and a review of the state of current pollinator health research, ESA can offer the preparation of a special journal issue on the topic. This special issue could also feature an article highlighting the National Strategy.

- ESA is involved in efforts to educate Congress on the important role of pollinators to agriculture and the environment. ESA can sponsor and organize informational Hill briefings that provide Congress with details about the National Strategy and the activities of federal agencies and partner organizations.

- ESA’s membership contains numerous experts on pollinators. Our organization is well-positioned to provide suggestions regarding areas of research that are needed to improve the health of pollinators and adequately inform regulatory decisions impacting pollinator health.

- ESA would also like to encourage the continuation of the Task Force in some form following the completion of the National Strategy through periodic meetings to review progress and
revise implementation plans as necessary; the society can help facilitate the continuation of Task Force activities if needed.

ESA believes that research in the following areas is needed; we would welcome the opportunity to discuss these needs in greater detail:

- Research on bee nutrition, including understanding the nutritional requirements of bees, the nutritional composition of different pollen sources, and factors influencing the quality of bee diets, could lead to new recommendations and supplements that could improve honey bee health.

- *Varroa* mite research, including novel miticides and new methods of controlling mites, including chemical-free approaches (hive heat treatments, for example).

- Land use research could help determine the benefits of leaving more wild refuges for wild plants, which would increase the biodiversity of plant life and the richness of pollinators’ diets.

- Research on forage and nesting resources will help to identify native and other plant species that can support managed and native bees.

- Pesticide research could provide insight into how different miticides, fungicides, insecticides, and herbicides affect honey bees and other pollinators, and whether their effects are compounded when combined with each other and with other stressors.

- Honey bee breeding research might lead to new strains that are resistant to mites and pathogens, can tolerate a wide range of weather conditions, and are more effective pollinators and honey producers.

- Research on the honey bee microbiome – the symbiotic bacterial species present in the guts of honey bees – will provide a better understanding of how these bacteria respond to environmental stresses and impact the health of the honey bee host.

ESA is the largest organization in the world serving the professional and scientific needs of entomologists and individuals in related disciplines. Founded in 1889, ESA has almost 7,000 members affiliated with educational institutions, science agencies, private industry, and government.

For more information about ESA, please visit [http://www.entsoc.org](http://www.entsoc.org), and do not hesitate to contact ESA Executive Director David Gammel at dgammel@entsoc.org if we can be of assistance as your work moves forward.

Sincerely,

Phil Mulder, PhD
President, Entomological Society of America