



JOHN ELIAS BALDACCI
GOVERNOR

STATE OF MAINE
DEPARTMENT OF AGRICULTURE, FOOD AND RURAL RESOURCES
BOARD OF PESTICIDES CONTROL
28 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0028

SETH H. BRADSTREET III
COMMISSIONER

HENRY JENNINGS
DIRECTOR

June 27, 2008

Nancy Oden
P.O. Box 186
Jonesboro ME 04648

Dear Ms. Oden:

On June 13, 2008, the Maine Board of Pesticides Control (BPC) held its monthly meeting at the John E. Dority Safety and Performance Training Center in Fairfield. During that meeting, the Board addressed your email of May 22, 2008, citing the German government's decision to suspend eight neonicotinoid seed treatments following a "mass death" of bees.

The Board has been following news and research relating to Colony Collapse Disorder (CCD) since 2006. Board members sought the input of Anthony Jadczyk, State Apiarist, for his views of the German incident and current research relating to CCD. Jadczyk offered the following observations:

- The German incident is atypical and is significantly different from CCD. Unlike CCD, dead bees were actually found next to the hive. Also, the incident is attributed to pesticides dislodged from treated corn seed. Normally, treated corn seed contains a "sticker" to prevent the pesticides from dislodging.
- Although pesticide exposure is one of the principle factors being investigated, a holistic review of recent research shows a stronger correlation between CCD and bee viruses and/or bee mites than it does between CCD and the neonicotinoids.
- Banning the neonicotinoids would likely result in a shift to more acutely toxic insecticides such as organophosphates.

Board members discussed CCD research at length. Following their discussion, they added the following points relative to the topic:

- The federal Environmental Protection Agency (EPA) is the principal regulatory body for determining what pesticides may be used in this country. The BPC does not have the resources to conduct extensive risk assessments. Consequently, the BPC generally defers registration decisions to the EPA.
- While the BPC has regulatory jurisdiction over pesticide distribution and use in the state of Maine, treated corn seed is considered a "treated article" (similar to pressure treated wood) and is not subject to the BPC's regulatory purview. Accordingly, the BPC has no authority over treated corn seed, even if they decided it was appropriate to cancel the state registration of the neonicotinoids.

Based on these points, the Board determined it was not appropriate to take any action at this time. However, they directed the staff to closely track research on CCD in collaboration with the State Apiarist. When more definitive research becomes available, the Board plans to revisit the issue.

Thank you for sharing your concerns about pesticide use in Maine. Feel free to forward additional information on the subject or share other concerns as they arise.

Sincerely,

Henry Jennings
Director
Maine Board of Pesticides Control