



July 3, 2012

Mary E. Tomlinson
Pesticide Registrar/Water Quality Specialist
Maine Board of Pesticide Control
Maine Department of Agriculture
28 State House Station
Augusta, ME 04333

Dear Ms. Tomlinson;

I am writing to you on behalf of the Maine State Beekeepers Association membership to express our support for Section 18 Emergency Exemption for the Varroa Mite treatment HopGuard. (a.i. Beta Acids) As I am sure you are aware, the Varroa Mite is an imported parasite to the European Honeybee which has been destroying U.S Honey Bee colonies since its arrival here in the mid-1980s. This mite and the associated viruses that it transmits presents the single most significant threat to honeybee colony survival in current times.

HopGuard, manufactured by Beta Tec Hop Products, is one of the most promising new tools for beekeepers to control varroa populations in honeybee colonies. HopGuard is an organic product derived from natural hop compounds. HopGuard presents a fantastic alternative for beekeepers, as it has several distinct and important advantages over currently approved varroa treatments.

1. HopGuard can be used during a honey flow (unlike essential oil organic mite treatments containing Thymol such as Apilife Var or ApiGuard)
2. HopGuard has no negative effects on brood and queen bees (as opposed to Formic Acid products which kill varroa, but also kill honeybee eggs and larvae and frequently cause queens to stop laying).
3. HopGuard's efficacy is not temperature dependent, so it can be used during periods when other treatments would either not work at all (too cold) or would kill bees (too hot) as is the case with both the Thymol products and the Formic Acid products.
4. HopGuard does not leave lasting chemical residues in beeswax which have been proven to negatively impact honeybee development (like Coumaphos and Fluvalinate)

We strongly urge you to approve a Section 18 Emergency Exemption for this product's use in honeybee colonies. It is critical that beekeepers have safe and effective varroa mite treatments which are easy to use, and most importantly are safe for beekeepers and for honeybees.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads 'Erin MacGregor-Forbes'.

Erin MacGregor-Forbes, President
Maine State Beekeepers Association