County IPM Advisory Committee Meeting, September 3, 2014

Public Comment from Susan JunFish, Parents for a Safer Environment

RE: Adjuvants broadcast sprayed in order of thousands of pounds annually may be of risk to wildlife as shown by UC Davis' presenter to IPM Adv. Comm.

Good morning Committee members. I hope you have all been having a nice summer. I regret having missed UC Davis' apiculturist Eric Mussen's presentation on Bee Colony Collapse Disorder and thank staff for coordinating his visit.

Even organic products can kill bees if they become exposed to them. That is why it's so important to refrain from using broadcast spraying that will expose non-target species. We credit Pestec, our structural pest control contractor, for not utilizing broadcast spraying of any type and rarely even using even the horticultural oils for insect control when prevention and self containerized bait stations can be used. Since pyrethrum, an extract of the chrysanthemum plants is listed as a possible human carcinogen, by the US EPA, I'd like to thank Pestec for also never having used this product in our county grounds.

I found the reference to the "recent tank mix problem that is killing honey bees" presented by Eric Mussen very relevant to the current county's IPM program. He states that there are fungicides and insect growth regulators (IGR's) with no known toxicity to honey bees that have been used in agriculture. These chemicals are mixed with an adjuvant, chemicals formulated to help with decreasing foam and providing penetration through the cell wall of plants usually considered to have low toxicity and often referred to as surfactants or soap. The Honey Bee slide states that mixing the formerly no known toxicity fungicide and insect growth regulators with newer adjuvants can result in severe adult bee and brood losses. The slides continues to say that over 80,000 colonies were damaged this way on almond crops this year.

One slide states, " We are seeing too many cases of synergisms between unrelated agricultural products, when tank-mixed, to state that any of them are safe combinations."

I'd like to ask county staff and the IPM Advisory Committee how this resonates with you. Should we review the adjuvants that the county is using at the order of thousands of pounds a year and determine whether any of the adjuvants being mixed with other pesticides have been linked to Colony Collapse Disorder? In the past, the community has been informed that adjuvants should not even been considered as pesticides that they function like surfactants or soap. The presentation by Eric Mussen clearly indicates that there is risk when mixing chemicals and synergistic effects can occur that may potentiate otherwise low toxic chemicals.

Research of this sort has also been conducted in the laboratory in earlier years and coined the “cumulative effect.”

One of the Honey Bee slides mention that EPA has a publican on residual times, the time that pesticide residues persist at a level hat will kill 25 percent or fewer bees that come into contact with them. We need to keep in mind this refers to acute toxicity and that there is still much unknown about chronic toxicity of low level exposure that can manifest in disorientation, inability to feed or take care of off spring, and lowered immune system so that they are more susceptible to diseases such as parasitic mites, viri or viruses, and bacteria that healthy bees can handle.

Thank you for addressing the large amount of adjuvants being applied in combination with other pesticides in our county’s IPM program and how we can possibly get more information about the toxicity when the adjuvants are listed as “confidential “ with the CDPR.