



Dear CEO,

On behalf of Friends of the Earth and allies, we invite your company to protect bees and other pollinators essential to our food supply and the environment by committing to not sell products containing pesticides linked to the global decline in honey bee populations. This includes pesticide products containing systemic neonicotinoid pesticides, as well as nursery bedding and vegetable plants treated with these chemicals.

As a top company dedicated to meeting growing consumer demand for environmentally friendly garden products, making this commitment would demonstrate your company's sustainability leadership and ensure that home gardeners across the country can trust your company as a provider of *truly* "bee-friendly" plants and garden products.

According to a recent National Gardening Association survey, more than 90 percent of households want to manage their lawns and gardens in an environmentally friendly way,¹ choosing eco-friendly products over those with toxic chemicals, such as all-natural repellents and organic soils. There is clearly a growing demand for safe, environmentally friendly alternatives and for organic growing methods that are benign to human health and the environment.

There is also growing public and scientific concern about the recent dramatic loss in pollinators around the globe, including honey bees, due in part to Colony Collapse Disorder – or CCD, a phenomenon in which bee colonies have been mysteriously collapsing with adult bees disappearing, seemingly abandoning their hives.^{2,3} This last winter, beekeepers from Maine to California consistently reported losses between 40-90 percent of their bees.⁴ Bees are essential to the production of one out of every three bites of food we eat.^{5,6} In fact, 71 of the 100 crops that provide 90 percent of the world's food— from almonds to tomatoes and strawberries—are pollinated by bees.⁷ Honeybees, in particular, contribute nearly \$20 billion to the U.S. economy⁸ and \$217 billion to the global economy.^{9,10} Yet evidence is mounting that the health and productivity of these critical pollinators, along with many wild pollinators, is declining rapidly.

Pests,¹¹ diseases, loss of forage and habitat¹² and changing climate¹³ have all been identified as possible contributing factors to unsustainable bee losses. However, a growing body of science has implicated a class of systemic pesticides known as neonicotinoids (neonics) — which are used on 140 crops and for cosmetic use in gardens — as a key factor in recent bee die-offs.¹⁴ Neonicotinoids can directly kill bees, and sub-lethal exposure increases pollinator vulnerability and decreases natural resilience to external stressors such as pests and pathogens.^{15, 16, 17 18}

This spring, based on recommendations by the European Food Safety Administration (EFSA), the European Union (EU) voted for a continent-wide suspension of several widely used neonics in order to protect bees. In the U.S., EPA continues to allow neonics on the market without a comprehensive data set on pollinator impacts and despite mounting evidence linking neonics to bee deaths. EPA has also received more than a million public comments urging swift protections for bees, yet the agency has delayed action until 2018.

The widespread agricultural use of neonicotinoids is a common exposure pathway for bees; however, cosmetic use of these pesticides in gardens, lawns, and landscapes may be an important contributing

factor in declining bee and wild pollinator health. Many of the “bee-friendly” seedlings and plants sold to unsuspecting consumers in nurseries and garden stores across the U.S. have been pre-treated with neonicotinoids at much higher doses than are used on farms, where levels of neonicotinoid use are already raising concerns among beekeepers and researchers studying the decline of pollinator populations. These nursery plants carry neither a list of pesticides used, nor do they carry a warning that these plants could harm pollinators.

In early 2013, in response to mounting scientific evidence and public concern, many of the UK’s largest home improvement retailers, including Homebase, B&Q and Wickes, made public commitments to no longer sell products containing pesticides linked to declining bee populations. We invite your company to join these industry leaders in signaling its dedication to sustainability and pollinator health by making this same commitment.

As your company may be unaware of this growing problem, we also wanted to ensure it was one of the first to see our new pilot study, *Gardeners Beware: Bee-Toxic Pesticides Found in “Bee-Friendly” Plants Sold at Garden Centers Nationwide*, found at www.BeeAction.org. This first-of-its-kind pilot study, co-authored by the Pesticide Research Institute, found that 7 of 13 “bee-friendly” garden plants purchased at top retailers in Washington DC, the San Francisco Bay Area and Minneapolis contain neonicotinoids that studies show could harm or kill bees and other pollinators.

Some of these pre-treated plants and off-the-shelf neonic products may be available for sale on the shelves of your company’s stores. Because there is no clear labeling to indicate the presence of neonics in nursery plants, your customers may unknowingly purchase pre-treated “bee-friendly” plants with the intent of providing habitat for bees and other pollinators, but end up causing them harm. *Obviously, this situation does not benefit pollinators, consumers, or, ultimately, your customers’ trust in you as a retailer.*

Friends of the Earth U.S. and allies are asking retailers to take action to help protect bees and other pollinators by committing to the following:

- **Do not sell off-the-shelf neonicotinoid insecticides for home garden use.**
- **Demand neonicotinoid-free vegetable and bedding plants from nursery suppliers and do not sell plants pre-treated with these pesticides.**
- **Offer third-party certified organic starts and plants.**
- **Educate your customers on why your company has made the decision to protect bees and other pollinators.**

We believe this action would demonstrate your company’s commitment to sustainability and protecting declining bee populations upon which our food supply and flowering plants depend. We also believe your customers would react positively, given the concern in the public for the plight of bees and the growing demand for sustainable and organic gardening products.

We will promote all companies that make this commitment and make public their policy to protect bee health by not purchasing or selling neonicotinoid plant treatments or pre-treated plants. These companies will be highlighted on our website, in social media, and in the press so consumers can see for themselves where a company stands on protecting bees before they go shopping for their gardening supplies.

We have also written to your competitors who stock similar products. We are also educating the public about the use of these chemicals in plants and off-the-shelf pesticide products, and are asking them to avoid using these in their gardens to protect bee health.

Please contact Lisa Archer, Director, Food and Technology Program at Friends of the Earth (beeaction@foe.org or 510-900-3145) so that we may discuss your company's current policies and how your company can show its leadership in corporate sustainability by committing to not sell products associated with bee decline. We would also be happy to answer any questions you might have or provide further information on this topic.

Thank you for your attention to this important matter. We look forward to working with you to protect the small but important creatures upon which so much of our food and plant life depends and we hope to be able to highlight your company as an industry leader.

Sincerely,

Lisa Archer
Director, Food and Technology Program
Friends of the Earth-U.S.

Paul S. Towers
Organizing & Media Director
Pesticide Action Network North America

Nichelle Harriott, PhD
Staff Scientist
Beyond Pesticides

Claiborne Deming, Jr.
Campaigner
SumOfUs.org

Larissa Walker
Policy & Campaign Coordinator
Center for Food Safety

Scott Hoffman Black
Executive Director
The Xerces Society for Invertebrate
Conservation

¹ National Gardening Association, "Garden Market Research: How Many Organic Gardeners Are There?" <http://www.gardenresearch.com/index.php?q=show&id=2896>. Accessed 4/1/2013.

² USDA. 2012. Colony Collapse Disorder Progress Report. CCD Steering Committee – Agricultural Research Service – United States Department of Agriculture. <http://www.ars.usda.gov/is/br/ccd/ccdprogressreport2012.pdf>.

³ Benjamin, A. "Toxic pollen and the mad bee disease disaster." The Guardian. March 29, 2012. <http://www.guardian.co.uk/environment/2012/mar/29/toxic-pollen-mad-bee-disease> (accessed 7/24/13)

⁴Wills, Rick. "Bee die-off a threat to U.S. food supply." Pittsburgh Tribune-Review, March 30, 2013. <http://triblive.com/news/editorspicks/3749963-74/bees-bee-winter#axzz2P1Q2wtpe> accessed 4/30/2013.

⁵ Klein AM, Vaissiere B, Cane JH, Steffan-Dewenter I, Cunningham SA, Kremen C (2007) Importance of crop pollinators in changing landscapes for world crops. *Proceedings of the Royal Society B: Biological Sciences* 274: 303–313.

⁶ Buchmann S, Nabhan GP. 1996. *The Forgotten Pollinators*. Island Press, New York.

⁷ United Nations Food and Agriculture Organization. 2005. Protecting the pollinators. *FAO Spotlight*. <http://www.fao.org/ag/magazine/0512sp1.htm>.

⁸ Calderone NW. 2012. Insect Pollinated Crops, Insect Pollinators and US Agriculture: Trend Analysis of Aggregate Data for the Period 1992–2009. *PLoS ONE* 7(5): e37235. doi:10.1371/journal.pone.0037235

-
- ⁹ Gallai N, Salles JM, Settele J, Vaissiere BE. 2009. Economic valuation of the vulnerability of world agriculture confronted with pollinator decline. *Ecological Economics* 68:810–821.
- ¹⁰ Losey JE, Vaughan M. 2006. The economic value of ecological services provided by Insects. *Bioscience* 56: 311–323. http://www.xerces.org/wp-content/uploads/2008/09/economic_value_insects.pdf.
- ¹¹ Cox-Foster DL, Conlan S, Holmes EC, Palacios G, Evans JD, Moran NA, et al. 2007. A metagenomic survey of microbes in honey bee colony collapse disorder. *Science* 318: 283–287; doi:10.1126/science.1146498.
- ¹² Naug D. 2009. Nutritional stress due to habitat loss may explain recent honeybee colony collapses. *Biological Conservation* 142: 2369–2372.
- ¹³ Potts SG, Biesmeijer JC, Kremen C, Neumann P, Schweiger O, Kunin WE. 2010. Global pollinator declines: Trends, impacts, and drivers. *Trends in Ecology & Evolution* 25: 345–353; doi:10.1016/j.tree.2010.01.007.
- ¹⁴ Mullin CA, Frazier M, Frazier JL, Ashcraft S, Simonds R, vanEngelsdorp D, et al. 2010. High Levels of Miticides and Agrochemicals in North American Apiaries: Implications for Honey Bee Health. F. Marion-Polled. *PLoS ONE* 5:e9754; doi:10.1371/journal.pone.0009754.
- ¹⁵ Williamson SM, Wright GA. 2013. Exposure to multiple cholinergic pesticides impairs olfactory learning and memory in honeybees. *Journal of Experimental Biology* 216: 1799–1807; doi:10.1242/jeb.083931
- ¹⁶ Henry M, Beguin M, Requier F, Rollin O, Odoux J-F, Aupinel P, et al. 2012. A Common Pesticide Decreases Foraging Success and Survival in Honey Bees. *Science* 336: 348–350; doi:10.1126/science.1215039
- ¹⁷ Whitehorn PR, O'Connor S, Wackers FL, Goulson D. 2012. Neonicotinoid Pesticide Reduces Bumble Bee Colony Growth and Queen Production. *Science* 336: 351–352; doi:10.1126/science.1215025
- ¹⁸ Pettis JS, Lichtenberg EM, Andree M, Stitzinger J, Rose R, vanEngelsdorp D. 2013. Crop Pollination Exposes Honey Bees to Pesticides Which Alters Their Susceptibility to the Gut Pathogen *Nosema ceranae*. *PLoS ONE* 8:e70182; doi:10.1371/journal.pone.0070182.