

MDA Interpretation of the Pollinator Label Language on Certain Neonicotinoid Products for use
in Soybean Aphid Management

The following pollinator label language exists on certain foliar-applied neonicotinoid (clothianidin, dinotefuran, imidacloprid, thiamethoxam) products (example- *Endigo zc). Applicators must follow the following label restrictions when applying these neonicotinoid products.

**FOR FOOD CROPS AND COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT
FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS**



Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless one of the following conditions is met:

- The application is made to the target site after sunset
- The application is made to the target site when temperatures are below 55°F
- The application is made in accordance with a government-initiated public health response
- The application is made in accordance with an active state-administered apiary registry program where beekeepers are notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying
- The application is made due to an imminent threat of significant crop loss, and a documented determination consistent with an IPM plan or predetermined economic threshold is met. Every effort should be made to notify beekeepers no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.

MDA Interpretation of label language:

Do not apply this product while bees are foraging: Bees are visible in the air or on flowers at the application site. Applicators should make every effort to protect the bees, and should try to avoid applying under conditions where bees are likely to forage.

Do not apply this product until flowering is complete and all petals have fallen: There should be no remaining flower petals on the plant. For crops that may not drop all petals (e.g. sunflowers), flowering is considered complete when bees are no longer foraging on the crop.

Bullet 1: The application is made after sunset and completed prior to sunrise. Sunset and sunrise timing should be established using local weather/solar information.

Bullet 2: Ambient air temperature at the time of application is below 55°F. Temperature information should be established using local weather station data.

Bullet 3: Applications initiated by the federal, state, or local government agency which have been requested to protect public health. For example, pesticides applied to an area to control mosquitoes in response to a public health emergency.

Bullet 4: Applicators cannot use this option to meet the label requirement. Minnesota does not have an active state administered apiary registry program, therefore, applicators are not required to notify beekeepers for planned pesticide applications. However, applicators are strongly encouraged to use FieldWatch/DriftWatch at, www.driftwatch.org to locate apiaries or sensitive crop areas on a state map in order to take extra precautions when applying pesticides and to notify beekeepers of planned applications.

Bullet 5: An imminent threat of significant crop loss can be interpreted as when pest densities have reached a level where they can cause an economic loss. The label has specific requirements for pre-determined economic thresholds that should be met. Economic thresholds may vary depending upon

the pest and the crop. The MDA interprets “pre-determined” to mean a qualified individual^[1] has evaluated and scouted the field to determine what threshold is appropriate.

For soybean aphids, the University of Minnesota extension determined a regional economic threshold of 250 aphids per plant for determining when economic losses from this pest are possible. This science-based economic threshold is considered sufficiently conservative for most field conditions experienced in Minnesota (<https://extension.umn.edu/soybean/soybean-pest-management>).

For applicators holding a MDA-approved pesticide applicator license: The applicator has recorded the pest thresholds prior to the application and will use the pre-set thresholds to make application decisions. Applicators should be able to provide these records to the inspector during an inspection. An example of documentation includes a completed scouting form, which can be found at <https://crops.extension.iastate.edu/blog/erin-w-hodgson/try-speed-scouting-soybean-aphid-year> or any other named and dated document showing the field was scouted for a pest infestation(s) and the pest density was recorded.

OR

A written IPM plan (which includes scouting to determine approximate pest population levels and use of an economic thresholds to determine when to apply a management tactic) exists for the subject field and the application is made in accordance with this plan. Applicators should be able to provide this plan to MDA agricultural inspectors during an inspection.

Applicators must maintain scouting and/or IPM documentation with other records of their pesticide applications.

For applicators who do not hold a MDA-approved pesticide applicator license: Applicators must ensure that applications are made only when a qualified individual^[1] documents that a relevant economic threshold, appropriate for their field(s), is met. Documentation of pest densities must be completed prior to application and applicators must possess this document at the time of application. Applicators must maintain this documentation with others records (if applicable) of their pesticide applications.

^[1] A qualified individual includes:

- an individual with a MDA-approved current pesticide applicator license;
- a certified crop advisor;
- a crop consultant; or
- any other individual with education and background in pest management.

For applicators applying neonicotinoid products to the property of others: Applicators applying neonicotinoid products to the property of others must ensure that the relevant economic threshold, appropriate to the subject field(s), has been recorded and the application is made in accordance with the recorded densities or the written IPM plan. Pest densities may be recorded by the applicator holding the MDA approved pesticide applicator license or by a qualified individual listed above. Applicators must maintain threshold records with others records (if applicable) of their pesticide applications.

Some products do not have the previously-mentioned exemptions but contain label language (example- *Belay insecticide) with other pollinator-related restrictions. These insecticides must not be applied during blooming, pollen-shed, or nectar-production on food crops. Applicators must follow all pollinator label restrictions when applying these products.

*This is a draft. Changes may be made if needed.

FOR FOOD CROPS AND COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS



This product is toxic to bees exposed to treatment for more than 5 days following treatment

Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period.

Insecticide products with the above label language cannot be applied to pollinator attractive crops during flowering. No exceptions exist for these products.

*References to commercial products or trade names made for demonstration only, with the understanding that no discrimination is intended and no endorsement is implied.

Soybean aphid in Minnesota soybean:

<https://extension.umn.edu/soybean/soybean-pest-management>