

Office Memorandum

DEPARTMENT OF AGRICULTURE

DATE: November 5, 2013

TO: Greg Buzicky, Director, Pesticide and Fertilizer Management

FROM: Dave Frederickson, Commissioner

SUBJECT: Neonicotinoid pesticide special review

In 2013, the Minnesota Legislature directed the Minnesota Department of Agriculture (MDA) to develop a report by January 15, 2014 that should include, among other pollinator-related proposals, "the process and criteria the commissioner of agriculture would use to perform a special review of neonicotinoid pesticides."

Because the basic process and criteria the MDA uses to conduct a variety of pesticide reviews has already been established, and because MDA has already reviewed several neonicotinoid concerns as part of its emerald ash borer insecticide review (including concerns about pollinator exposure), I am directing your staff to initiate a special review of neonicotinoid pesticides and insect pollinators in advance of the legislative report's due date. As such, the legislative report will go beyond outlining the process and criteria of a special review, and include a status report on progress of the review.

MDA's in-depth special reviews of pesticides generally include an opportunity for public comment regarding their proposed scope so that interested parties have an understanding of the criteria to be used in conducting the review. As part of preparing for public comment on the review, your staff should include in the scoping and review process partners at the Minnesota Department of Natural Resources (DNR) and the Minnesota Pollution Control Agency (MPCA).

The review should not be redundant of the analyses and decisions of ongoing neonicotinoid reviews and pollinator protection activities of the U.S. Environmental Protection Agency. Rather, the goal of the review should be to understand federal activities and related research efforts to characterize any unreasonable adverse effects of neonicotinoid use on insect pollinators, and how those effects might be considered in the context of neonicotinoid use in Minnesota using state-specific outreach, education, registration and, if necessary, regulations.