



### *Steering Committee*

*Pete Berthelsen  
Pheasants Forever*

*Zac Browning  
Browning Honey Co. Inc.*

*George Hansen  
American Beekeeping Federation*

*Gerald Hayes, Jr.  
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*Maria Trainer  
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*Richard Waycott  
Almond Board of California*

*A full list of Coalition members is  
available at:*

[www.honeybeehealthcoalition.org](http://www.honeybeehealthcoalition.org)

## **Honey Bee Health Coalition Comment on EPA's Preliminary Pollinator Assessment to Support the Registration Review of Imidacloprid**

March 8, 2016

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC), (28221T)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

Attention: Docket ID No. **EPA-HQ-OPP-2008-0844**

The Honey Bee Health Coalition is a diverse public-private partnership that brings together beekeepers, crop producers, researchers, government agencies, agribusinesses, conservation groups, manufacturers and brands, and other key partners to improve the health of honey bees and other pollinators. The Coalition's efforts focus on collaborative solutions to improve the health of honey bees and other pollinators in the context of productive agricultural systems and thriving ecosystems.

The Honey Bee Health Coalition supports the use of risk-based assessments in understanding factors that may impact honey bee health, including factors that may impact acute losses and/or chronic effects resulting in losses over winter and during other times of year. The Coalition does not have a position on the specific methodology nor results associated with the EPA's preliminary pollinator assessment for imidacloprid, but it supports the need for and use of a comprehensive risk-based approach.

Sincerely,

The Honey Bee Health Coalition Steering Committee

p.p.

Julie Shapiro

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