



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

July 29, 2014

Mr. John W. Scott  
ASPCRO President  
Colorado Department of Agriculture  
700 Kipling Street, Suite 4000  
Lakewood, CO 80215-8000

Subject: ASPCRO Guidance for Bee Language for Neonicotinoid Products  
Draft Document Dated June 4, 2014

Dear Mr. Scott:

We have reviewed the document developed by the Association of Structural Pest Control Regulatory Officials (ASPCRO) that provides interpretation for pesticide state lead agencies (SLAs) of the pollinator protection labeling required by the Agency's August 15, 2013 letter to registrants of nitroguanidine neonicotinoid products. The required labeling applies solely to those products that may be applied as foliar applications. As you know, the intent of the labeling was to more effectively communicate to applicators the potential risk these products pose to pollinators, especially honey bees, and to protect them by limiting exposure to the extent possible. We appreciate the support the SLAs have provided us in this effort.

The ASPCRO Guidance Document reflects the appropriate interpretation of the pollinator protective labeling for the products used in structural and non-agricultural pest control and we concur on the Document.

If you have any further questions, feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Meredith F. Laws". The signature is written in a cursive, flowing style.

Meredith F. Laws, Chief  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs