



THE GARDEN CLUB *of* AMERICA

14 EAST 60<sup>TH</sup> STREET, NEW YORK, NY 10022-1006

212.753.8287/FAX 212.753.0134/GCAMERICA.ORG

May 5, 2017

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 1101A  
Washington, DC 20460

Dear Administrator Pruitt:

The Garden Club of America is concerned about the presence of neonicotinoids in many seeds and plants sold at home-improvement stores and gardening centers. Because many such plants are pretreated with neonicotinoids, Americans are unknowingly exposing pollinators to neuro-disruptive insecticides.

The pollen and nectar of treated plants may contain "neonic" residues that can prove lethal to pollinators. Such residue may persist in plants and soil for months after application and has been found in woody plants up to six years after application. Milkweed treated with neonicotinoids poses a particular concern, as it can be lethal to monarch larvae. According to Dr. Chip Taylor of Monarch Watch, a monarch caterpillar may die after eating only two to three bites of a neonicotinoid-treated milkweed plant. Consumers are largely unaware of the presence of neonicotinoids in the plants they purchase. Thus, even those who are attempting to help protect pollinators by planting pollinator-attracting plants such as milkweed may be unknowingly harming them.

Since pollination is an ecosystem service that humans depend on through its link to food production, it plays an economically valuable role: in fact, a study by Cornell University estimated that pollinators contribute \$29 billion to U.S. farm income (Ramanujan, 2012). In addition to their economic value, pollinators provide aesthetic and cultural value as many wildflowers and garden plants require pollination to live.

With 18,000+ members nationwide, The Garden Club of America is a nonpartisan organization that for more than a century has cared deeply about protecting biodiversity. The Garden Club of America's position paper on Sustainable Agriculture, Seed Diversity, and Food Security supports "recognizing the importance of pollinators and encouraging them by increasing and preserving natural habitat and supporting efforts to work with pesticide manufacturers, agricultural interests, and beekeepers to determine best management practices for pollinator health." With this in mind, we ask that the U.S. EPA take action to require seed and plant distributors either to stop using neonicotinoids or, at minimum, to clearly mark the treated plants so that consumers can make informed decisions.

Thank you for your consideration of this important matter.

On behalf of the Executive Board of The Garden Club of America  
Anne P. Copenhagen, President of The Garden Club of America



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The Honorable Sonny Perdue Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S. W.  
Washington, DC 20250

Dear Secretary Perdue:

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Anne P. Copenhaver, President of The Garden Club of America