

Use History Validation

Date: September 23, 2011

Director General
Value and Sustainability Assessment Directorate
Pest Management Regulatory Agency
2720, Riverside Drive
Ottawa, ON K1A 0K9

Subject: Validation of use history

This is to validate the use history supplied by MITE GONE Pads to support the use of ...Formic Acid (65 %) to control the following pests -Varroa Mites, on the following crops: Honey Bee Hives.

Please provide explanation regarding the performance of the product for the use being proposed for registration.

Use of MiteGone Pads since 2002 (both spring and fall) has resulted in 90% plus eradication of existing adult mites in each application monitored in each of several Bee Yards. This non-invasive treatment does not materially force either the house bees and/or field bees plus queen from the hive as does Kramer pad (Miteaway) treatment. The most beneficial positive of the Mite Gone treatment for us is the ease of use and one-time application resulting in time savings. I have also used MAQS treatment this year but had significant brood mortality or apparent physiological damage in newly emerging brood.

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Professional qualification: Beekeeper for 30+ years. Bsc. In Chemistry. Organic Farmer

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Experience with commodity: *(Why do you consider yourself qualified to validate the use history?)*

Almost 10 years experience with Mite Gone as main source of Mite control (occasionally use Oxalic Acid during winter wrapping) for about 75-100 hives in a variety of locations in central Ontario. Attendance at many neighboring Bee Associations indicates falicy in what other beekeepers are doing for mite control both in choosing resistant products to applying product at inapropriate times. Research at our home yards confirms efficacy of 65% Formic and original use of Formic pads on top of brood nest (as in Miteaway 11) in spring has often resulted in dead brood and dead queens due to significant temperature swings. Mite Gone delivery system fits well with the natural ventillation of the hive and does not interfere with other necessary hive manipulations, thus saving significant time and less exposure of beekeeper to chemicals.

Yours truly,

James R. Peirce.....