



22 February, 2024

House Agriculture Committee  
Vermont State House  
115 State Street  
Montpelier, Vermont 05633-5301

Re: Bill H.706 - Banning the Use of Neonicotinoid Pesticides

Dear Committee Members,

The Connecticut River Watershed Farmers Alliance (CRWFA) is a farmer-run organization that represents a diverse group of farmers in the Connecticut River catchment area: large and small dairies, meat and egg producers, feed and forage producers, graziers, fruit, vegetable and specialty crop producers, and more. We have farmers who farm with innovative practices, some with conventional practices and others with both. Several are certified organic, and many consider themselves sustainable or regenerative. Many farmers make high quality products without any labels at all. All of our farmers care deeply about water quality, natural resources, and the ecological functioning of our landscape. As professional growers, we have learned that profitability and quality of life are just as integral to sustainable and regenerative land-use as our practices.

We welcome the intention of H.706. We also have concerns about the details. As Quebec has shown, and New York no doubt will show, farmers *can* transition away from neonicotinoid treated seed use (NTS). However, agricultural systems in both regions are quite different than here in Vermont. For example, farmers here use NTSs on feed crops in dairy systems. We have very little of the value-chain infrastructure to support the rotations and diversification farmers in Quebec have relied on to make an easy transition. In Quebec, the political and economic environment makes it easy for farms to access untreated seed (the large cooperatives previously bought seed and treated it themselves before distributing it to farmers). Quebec also offers insurance incentives of CAN\$18 an acre when farmers have crop loss related to using untreated seed.

New York has encouraged farmers and seed suppliers (which the New York bill addresses), to transition away from NTS. It also requires Cornell University to do further study. These are important pieces of the legislation supported by nearly all stakeholders and signed into law.

We hope you will adopt language from the NY Birds and Bees Protection Act. As you've heard during testimony from farmers, extension and researchers, farmers in Vermont don't use just one seed variety. There are many considerations for what seed to plant where, when to plant it, and how to plant it. Choosing a shorter-day corn, for example, can help farmers adopt practices that regenerate soil, and improve water resources, while enduring challenging weather conditions and diverse soil types. Seed varieties are a key to sustainable and regenerative agriculture; seed choice is just as important as other practices farmers use, like growing cover crops and reducing tillage.

We do not want to unduly delay implementation, but Vermont farmers are concerned that they will not have the necessary selection of untreated seed that they require until New York moves the market. Being a small state with limited leverage in the seed marketplace, many of our farmers rely on varieties in demand in larger markets like New York. Using the NY state timeline for phasing out NTS should give our growers relief from losing varieties that can help them adopt innovative and progressive practices – and survive in difficult years.

There is much to learn about the pests NSTs are used against, and how to reduce the risk they pose, and about alternative growing strategies. Things have changed quite a lot in Vermont agriculture since these pests were last studied, and we want to catch up quickly. Integrated Pest Management (IPM), whether chemical or organic, relies on in-depth knowledge and experience.

We ask that there be relief to restrictions for other commercial growers (e.g. orchardists) who rely on neonic sprays in the absence of viable alternatives; similar to waivers granted in Quebec that allow third party crop advisors to monitor and agree that viable or economic alternatives are not available.

We also have concerns about some of the Committee's post-testimony discussion. We hear conversation about the place of dairy and the main strategies for doing dairy in Vermont – growing corn and forage for feed. You are asking important questions. We are major stakeholders and should be a part of these conversations during the crafting of legislation and not in response to new bills. What do we all want the future of agriculture in Vermont to look like? Include us in these discussions. We provide unique perspectives on how we can transition to that future.

Thank you for your consideration. And thank you for your leadership on this issue.



Michael Snow

Executive Director (and farmer)



Paul Doton

Chair (and farmer)