

Dear Legislative Committee on Administrative Rules,

My name is Ross Conrad. I live in Middlebury where I have been a beekeeper for over 30 years. I served on the Vermont Pollinator Protection Committee and participated in developing the recommendations the committee produced. After reviewing some of the testimony provided by Cary Giguere regarding the proposed pesticide rules currently under consideration it would seem that perhaps he is remembering conversations that occurred within the VAAFAM, because they certainly did not take place within the Pollinator Protection Committee. In particular I am referring to Mr. Giguere's statement:

"The Committee [referring to the Pollinator Protection Committee] outlined exactly what they wanted updated in the regulations and said change your regs to meet these specs, and all of those changes are in the regulations. What Ms. Bellairs is talking about are other recommendations that weren't supposed to go into the regs but were just something that the Agency should do and they have been done in portions over the years either through legislation or through policy at the agency. And we can be more specific on those counts. I don't have my copy of the Report; I don't remember it was so long ago."

As you may recall, the PPC was tasked with developing a Pollinator Protection Plan (PPP) for the State of Vermont. After reviewing testimony on the various issues confronting Vermont's pollinators, members of the committee submitted proposals and suggestions describing what we would like to see included in the PPP. We then debated and voted on the various suggestions. By the time we had completed reviewing and voting on all the suggestions and ideas, we had run out of the allotted time that the legislature had specified for our committee to complete its work. As a result, we agreed that the VAAFAM would take all the ideas we had approved and work them into a Pollinator Protection Plan. As you are aware, the plan was never written, but a list of recommendations was written by VAAFAM and released in *Vermont's Pollinator Protection Committee Report to the Vermont Legislature as Required by Act 83 of the 2016 Session*. Please note: At no time did the PPC debate and vote on which suggestions we wanted to see in regulations and which we did not. Nor did we ever agree on any prioritization of the various suggestions and ideas that were approved by a majority of the committee. In fact the committee never debated and approve the final report. We only approved the various suggestion as outlined in the report.

Regarding the specific wording of the various recommendations, I as a member of this temporary citizens committee created by the legislature to develop a Pollinator Protection Plan (PPP) did not believe we were given the authority to tell the legislature or VAAFAM specifically what to do, nor do I remember anyone telling the committee that we did. This is why the wording of many of the recommendations uses the word "should" rather than the word "shall". Perhaps if the PPC had debated the final wording of the final Report, these issues would have come up and been resolved. Since the PPC never voted to prioritize the recommendations that were agreed to by the majority of committee members, or vote to approve the final wording of the final report, no-one can honestly say what the committee wanted to see in regulation and what we did not. It appears that those decisions now fall to you.

If Vermont was to prioritize anything I would suggest the following three recommendations:

1. Vermont should institute a statewide program of Integrated Pest and Pollinator Management (IPPM) through UVM Extension to gather and disseminate information on ways for producers across all agricultural sectors to limit wherever feasible, toxic pesticide use that may harm pollinators: The program should include efficiency (using only the amount needed to get the job done), conservation (not treating unless there is a verified problem), the prioritization of chemicals that have lower toxicity and/or lower persistence when it comes to pollinator health, and consider using non-toxic/non-chemical alternatives to pesticides whenever feasible.
2. The Agency of Agriculture Food & Markets should track all pesticide use and **set goals for pesticide reduction**. (Emphasis added)
3. The Agency of Agriculture Food & Markets should work with the UVM Extension program to set specific IPM thresholds before use of pesticides, identify less toxic options for farmers, and **reduce overall use of pesticides**. (Emphasis added)

It was clear to the committee that all pesticides have the potential to harm pollinators either directly, when combined with other pesticides to form synergistic compounds, or because of adjuvants or other “inert” ingredients they contain. Therefore, treating pesticides like we do fossil fuels, with clear goals to reduce and eventually phase out their use wherever practical, is the only real long-term solution that might actually work since industry has a history of simply replacing harmful chemicals that are retired with new chemicals that typically turn out to be just as harmful if not more so.

Please feel free to reach out if you have any questions. Thank you all for your time and consideration in this matter.

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Bees be with you,
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