

Rep. Carolyn Partridge, Chair

February 21, 2019

House Committee on Agriculture and Forestry
Vermont State House
115 State Street
Montpelier, Vermont 05633

Dear Representative Partridge,

Thank you for providing me with the opportunity to testify yesterday on H.205 *An Act Relating to the Regulation of Neonicotinoid Pesticides*. During yesterday's testimony there were a number of statements that were made during the testimony that I found to be misleading and incomplete and am writing to you and the rest of the House Agriculture committee to provide clarification on these statements.

Margaret Laggis indicated that due to their lower toxicity to mammals (i.e. humans) systemic neonicotinoid pesticides are safer than what farmers used to use (organophosphates and pyrethrins) and farmers would be forced to go back to using these more toxic products should treated seeds become unavailable.

- While it is true that neonicotinoids appear to be less toxic to humans and other mammals, neonics are much more toxic to insects than the old organophosphate and pyrethrin pesticides. This is the apparently a major reason for the crisis unfolding among pollinators and the rest of our insect populations.
- Additionally, when farmers were forced to use older, more toxic chemicals, they use them more carefully. They would apply only when needed since farmers know that they are highly toxic to humans as well as insects. Today's neonics are being applied prophylactically whether the farmer has pest problems or not. While the old pesticides are more toxic to people and used in higher concentrations than neonics, Vermont's pollinators would actually be better off if farmers went back to these older pesticides as they would be less likely to be used when they were not needed.

Mrs. Laggis also noted that the neonicotinoid pesticides are applied to the seed, removing the need to be sprayed on the field, implying that this benefits pollinators and other insects that will not be exposed to toxic sprays and thus spared accidental exposure.

- The older pesticides only impacted pollinators that came in contact with the chemicals. As a result, farmers could mitigate pollinator problems by not spraying when flowers are blooming, or when pollinators are not flying (i.e. during the night, when it is raining or too cold for pollinators to fly). By the time the pollinators showed up, the chemicals were dried up or broken down and not as harmful to the pollinators.
- Due to their systemic nature, plants that have been exposed to neonicotinoids or grown from treated seeds are toxic to all the pollinators that visit the plant throughout the entire growing

season. Pollinators are guaranteed to be exposed to the pesticides no matter when the visit occurs. Farmers can no longer mitigate potential exposure like they used to, once again making a return to the organophosphate and pyrethrin pesticides actually a better situation for pollinators than continuing to use neonicotinoids. We humans can consciously avoid pesticides exposure, our pollinators cannot.

Mrs. Laggis also mentioned the work that the industry did to modified conditions in order to reduce pesticide residues in the dust emitted during planting. This is fine and helped out western farmers, but does not apply to Vermont since our farmers do not use pneumatic planters.

Thank you again for giving me the opportunity to testify before your committee and for giving this important issue your time and consideration.

Sincerely,

Ross Conrad
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