

February 28, 2019

Members of the House Committee on Agriculture and Forestry
Committee Room 32
115 State Street
Montpelier, VT

Subject: HB.205 To Regulate the Sale and Application of Neonicotinoid Pesticides.

Chair Partridge, Vice-Chair Graham, and distinguished members of the House Committee on Agriculture and Forestry

Thank you for the opportunity to submit written testimony about HB 205 which would designate neonicotinoids as a restricted use pesticide in Vermont, increases pesticide registrations to \$200, and creates additional certification and requirement for beekeepers. We respectfully submit this opposition testimony and **request an unfavorable vote.**

Imidacloprid is the treatment of choice for invasive pests around the home such as Japanese beetle, Asian long horned beetle, hemlock wooly adelgid (HWA), emerald ash borer, and Asian citrus psyllid, but it is also very effective in the control of more common and very important insect pests including aphids, grubs, white flies, leaf miners, ticks, chiggers, and termites.

The importance of tools to control invasive insects cannot be overemphasized. As stated in the University of Vermont Extension website "The Asian longhorned beetle, emerald ash borer, and hemlock wooly adelgid are of great concern to Vermont. These pests have already killed millions of trees in the U.S and Canada and have racked up huge ecological, recreational, and commercial costs. They alter the availability of habitat, shade, and shelter for wildlife. They also disrupt the food web, water cycle, and carbon cycle in forest ecosystems." (see <https://vtinvasives.org/gallery-of-land-invasives>).

Imidacloprid containing Tree & Shrub products are the only do it yourself solution available to consumers for these invasive pests.

While there are government eradication programs for invasive insect control, they are difficult to achieve without permission from the homeowner. Some homeowners refuse to allow USDA or State Ag personnel on their property to treat the insects. The untreated areas become harborage for the invasive pests. For instance, HWA destroys hemlock trees both in the residential landscape and hemlock forests. Eradication of this pest is vitally important in all areas since our at-risk hemlock forested areas are a major foundation tree species that define the forest structure and control ecosystem

dynamics¹. Imidacloprid containing products allow the homeowner to treat for the invasive insects and other pests without government intervention.

The next invasive pest infestation occurring in the USA and likely to be in Vermont soon is the spotted lanternfly. It is native to China, Bangladesh, Vietnam and now found in eastern U.S. First discovered in PA and has shown up in MD, VA, DE, NJ, and NY. The invasive insect will feed on 70+ species of plants but prefers Tree of Heaven (*Ailanthus* sp.) for mating. And it also seems to prefer grapes, hops and orchard trees.

To quote the University of Vermont Extension “The threat of invasive species is not going away. It’s a long-term stewardship issue that must become a daily part of how we look at and care for the woods that provide us with beauty, recreation, forest products and our heritage.” (see <https://vtinvasives.org/gallery-of-land-invasives>).

Homeowners spend millions of dollars each year on purchases of plant fertilizer and pest control in order to maintain their investment in turfgrass, trees, shrubs, and flowers around their homes. They are not only making their homes aesthetically pleasing, but research has shown that they are sequestering more carbon in their well-managed turfgrass² and with their well-maintained trees³ compared to poorly managed landscapes. Homeowners expect results that justify the significant expenditure in terms of dollars, time, and effort especially if they are doing all the work themselves. A homeowner making his/her own applications, expects a product to be safe for humans, safe for the environment, effective in controlling a broad spectrum of insects and easy to apply. These attributes are why imidacloprid containing products are the products of choice.

The popularity of imidacloprid is due in part to its ease of application. The products containing imidacloprid are applied either as a spray, liquid drench or granular drench providing the applicator with wide flexibility in delivering the insecticide to its intended target. With the ready-to-use bottle the homeowner needs only to unwrap the bottle and begin spraying and with the ready-to-spray bottle one has only to hook-up the garden hose to the bottle to begin spraying; the correct dose is automatically metered by the sprayer. It’s that easy, and to protect bees and other pollinators, the spray applications are limited to plants not in bloom and when bees are not present. When applied to the soil or potting mixture as a granule, liquid spray, or drench, this type of application allows for incorporation into the soil media and to come in contact with targeted soil insect pests e.g. grubs, termites, etc. or be taken up by the plants and distributed to the stems and leaves for protection against foliar feeding insects e.g. Japanese beetle adults, aphids, leaf miners, tree borers, etc. With a soil application, the amount of imidacloprid moving to the flowers of the treated plant is generally below toxic levels to bees and other pollinators, but the leaves and stems are protected from the pest for several months up to one year. The same holds true for termite control when the product is applied to the soil and immediately watered-in. The treatment lasts up to one year and at a very economical cost. Obviously, the benefit of a soil incorporated application is low exposure of the chemical to non-applicators (adults, children, and pets) and pollinators.

¹ Havill, Nathan P., Vieira C. Ligia, Salom Scott M. (2014) Biology and Control of Hemlock Woolly Adelgid United States Department of Agriculture Forest Service FHTET-2014-05 Revised June 2016 p.4.

² Qian, Y., Follett, R.F. (2002) Assessing soil carbon sequestration in turfgrass systems using long-term soil testing data. *Agron. J.* 94:930–935

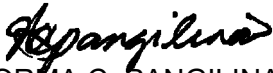
³ Nowak, D.J., Crane, D.E. (2002) Carbon storage and sequestration by urban trees in the USA. *Env.Pol* 116: 381-389.

A home is the largest investment most consumers make. A well-maintained garden or yard increases a home's value. Imidacloprid products are primary in protecting the homeowner's flowers, shrubs, trees, and turf from insects. It provides an affordable way to protect the homeowner's landscape with a minimum of hazard to the surrounding environment.

SBM Life Science Corp. requests an unfavorable vote to the Vermont HB.205 and allow the homeowner access to very important tools.

Thank you for considering our comments.

Sincerely,



NORMA C. PANGILINAN, Ph.D,
Head of Regulatory Affairs North America

SBM Life Science is the Home & Garden division of SBM Company. This division employs 350 staff members, with more than 20 locations in Europe and the US. With over 2,500 products distributed worldwide, SBM Life Science is an expert on plants' care and beauty as well as protecting the home against rodents and insects.