

Comment on H.205, 2019, House Committee on Agriculture and Forestry  
20 February 2019  
Michael Bald, Royalton, VT

Greetings,

Thank you for the opportunity to offer input on H. 205.

I welcome the bill and the intention behind its introduction.

I agree that the use of neonicotinoids should be restricted to professional, certified applicators.

I'm concerned, however, that usage by uninformed homeowners may continue if not more specifically addressed. It is a simple matter to obtain and import neonicotinoid pesticides from across state lines, and I offer this wording from a bill presently in the MA legislature as an example of much stronger language. Enforcement protocols and education outreach would be the final elements in a comprehensive Best Practices effort.

Bill SD.1366 (Commonwealth of Massachusetts):

*SECTION 4. Said chapter 132B is hereby further amended by inserting after section 6K the following section:-*

*Section 6L. (a) Neonicotinoids shall not be sprayed, released, deposited or applied on any property within the commonwealth.*

*(b) No blooming or flowering plant, plant material or seed that has been treated with a neonicotinoid shall be sold within the commonwealth unless it is clearly and conspicuously labeled as having been treated with a neonicotinoid and includes a brief description of the risks to pollinators and other non-target organisms associated with the use of neonicotinoids.*

I am equally concerned that the purpose of the ban is to protect pollinators.... yet no other stressors of the pollinator community are addressed or even acknowledged. Acknowledgment does not necessitate action; it merely offers validation and credibility. As an example, look to the phrase “substantial equivalence” which was rolled out by chemical companies several decades ago. By getting that phrase onto the table at the United Nations, the companies had a legitimate foundation on which to further enhance the appeal of their product (never mind that the phrase is virtually meaningless from a scientific standpoint). In that light, I suggest that the bill, and by extension the legislature, acknowledge the many stressors on pollinators. These include climate change, crop monocultures, the practice of glyphosate dessication for certain harvest crops, chemical legacies in the soil, and cumulative effects- the consideration of ALL toxins deployed collectively in an area of habitat during the growing season. I have stated before to the Pesticide Advisory Council that landscapes in Vermont may experience seven or more pesticide exposures each year. Pesticides degrade or become immobilized, but they leave a legacy in the soil and even off-gas CO<sub>2</sub> as they degrade. This is the beginning of the cumulative effects conversation. By acknowledging these additional factors, the backdrop is clarified and the table is set for further discussion on another day; without such acknowledgement, these players remain forever in the shadows.

I would also recommend that this bill seek to further the necessary work of some kind of Pollinator Protection Committee; funding to directly support beekeepers would be a good start point.

Thank you,

Michael Bald  
Royalton, VT