

In general, I am in support of this bill. Increasing pesticide registration fees to help fund research, education, and outreach related to pollinators is a great step towards improving pollinator health in Vermont.

Below are some suggestions and comments related to H.205:

- What is the definition of 'bees' as presented in H. 205? For example, does the definition include commercial bumble bee colonies imported for pollination of greenhouse crops?
- The bill should require registration for treated article seed. A large majority of neonics are brought into VT through treated seed. Research shows that treated seed are a big problem for pollinators (see research summary).
- Re: Beekeeper certification program: I do not believe certification should be mandated for VT beekeepers. If the state wants to help improve new beekeeper education, it could use the funding and/or resources to help build up VBA's education program for new beekeepers. This could be in conjunction with UVM (I am teaching a beekeeper course at UVM this summer). The curriculum could be made available online, endorsed by the state and VBA and 'highly suggested' for new beekeepers.
- I suggest requiring a fee for nucleus colonies brought into the state for resale. According to the Vermont Apiculturist, each spring 5000-6000 nucleus colonies are brought into Vermont from out of State, for resale. These colonies require a health inspection by the State Apiculturist, and his team. The funding for these inspections is taken directly from the Apiary Inspection Program. The VBA feels that because these honey bee colonies are to be resold, a small fee should be levied to cover inspection costs.
- There are several additional pollinator-related issues that could be assisted with funding from the pesticide registration fees. I would like you to consider the following for this or future discussions:
 1. Funding from pesticide registration fees should also be used to take action on the recommendations put forth by the Pollinator Protection Committee. Adding mention on this into the bill will enable more flexibility in the use of pesticide registration fees to take action on these recommendations that include protection for native bees as well as managed honey bees.
 2. It is important to Vermont Apiary Inspectors and VT beekeepers have a means for testing bees for pests and pathogens, especially if tests are going to be required for imported bees. I am an expert in bee disease diagnostics and a research affiliate at the University of Vermont. I recently submitted a SCBG to develop a bee disease clinic at UVM that will test bee samples for the major

bee pests/pathogens. Additional funding through pesticide registration fees would allow us to test for additional testing including RNA viruses.

3. The state bee inspector needs to attend the national beekeeping conference and Apiary Inspectors of America meeting each year for professional development. This annual conference/meeting allows us to stay at the forefront of bee research. The state has repeatedly denied funding in the past and VBA has funded our state bee inspector's attendance in this national conference/meeting.