

13 Claire Pointe Rd.
Burlington, VT 05408

January 17, 2023

Charlene Dindo
Legislative Committee on Administrative Rules (LCAR)
Montpelier, VT 05620

RE: Rule P22-06, Revision of Pesticide Regulations

Dear Members of LCAR:

My engagement with LCAR on the pesticide regulations has been instructive, and I must say, disappointing. I appreciate the help of Charlene in communicating with you, the Committee, your time in listening to our testimony, and your taking testimony on short notice. I appreciate that some of you had real questions.

We gave you good, legal reasons to object to these regulations in November. And more reasons in December.

I am saddened that you were unwilling to object to the Rule at the first opportunity for your own several reasons: perhaps you accepted VAAFM's assertions that the regs were improved; or, you did not want to offend various constituencies; or, you did not accept or understand the valid reasons for objection to the Rule presented by community advocates; or, you did not know how a delay would produce a better rule; or you just did not grasp the failure of these regulations to prevent the cumulative and synergistic dangers of the thousands of pounds of pesticides - some containing PFAS -used in Vermont.

Now, the public process in which we were all engaged has been subverted by two state agencies, placing the burden of change on one or two people outside of the public process. The resulting language on spraying for mosquitos appears circular, provides no clear standards for determining hazard, and makes no mention of PFAS contaminants in the insecticides used and their dangers. The agreement on the workgroup has no clear, enforceable outcome on phasing out toxins in schools to protect vulnerable children, and fails to correct other ways in which the Rule is inconsistent with legislative intent.

It is my considered opinion that the LCAR process has failed the people of Vermont at this critical moment in time: we had an opportunity to examine and challenge a paradigm of using thousands of pounds of economic poisons to solve problems, some of which we create. Now we are all stuck with a rule that perpetuates and legitimizes the poisoning of land, water and food, destruction of species, and degradation of human health.

Will you work with us as we work for more protection for the people, land, wildlife, and water from the million pounds of synergistic toxins released yearly into our midst?

We will not be silent. We are not going away. We invite you to join us in claiming our human nature to be creative and respectful of all life, of water, of the Earth, our island home, at this crucial time in human history on Earth. We are all interconnected with and dependent upon the community of life; we share the water, air, and land with each other and our other many-legged and winged brothers and sisters. What we do to Earth we do to ourselves.

Respectfully,

Sylvia Knight
VT Pesticides & Poisons Action Network
Earth Community Advocate and Researcher

