

Regarding Rule number 25P031 on neonicotinoid use best management practices:

I am an award-winning environmental author and President of Nature Aligned Vermont Foundation, which focuses on pollinator health, habitat and education. I would like to express my concern about the best management practices (BMPs) up to 2029. Not only do the BMPs appear to violate Act 182 2024, but these practices would negatively impact the wellbeing of pollinators and introduce toxins to our watersheds and soils. The ecological harms of these insecticides (spray and coated seeds), including beyond the targeted area, are well documented. However, any economic benefit to farmers is far from clear.

I join colleagues at the Vermont Pesticide and Poison Action Network (VT PAPAN) in calling for BMPs to be amended as follows:

- 1) Remove aerial spraying, including by drone, from BMPs to protect pollinators and birds.
- 2) Require that the BMPs follow guidance in Xerces et al on observing buffers to water.
- 3) Strengthen the language of the BMPs to reflect the imperative for insects and all wildlife to be free from neonic and to adhere to the laws designed to protect our farmlands, wildlands and waterways.

Thank you for your consideration.

Respectfully,

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