

In regards to Rule number 25P031.

On 1/8/26 (8-9AM) the Legislative Committee on Administrative Rules (LCAR) is scheduled to consider the Best Management Practices (BMPs), required by Act 182, and written by the Agricultural Innovation Board (AIB) during 2024 for the use of neonicotinoid insecticides and neonic-treated seeds until 2029. The BMPs were developed during meetings in 2024 in discussions with various pollinator experts (see point 1 below).

**MAJOR POINTS:** These BMPs appear inconsistent with the law, Act 182, 2024, in two major ways:

1. Allowing aerial spraying of neonicotinoids will endanger the very pollinators and birds the law is meant to protect. Pollinator experts from Xerces Society, Cornell, UVM, Penn State University and University of Nebraska, Lincoln recommend NO aerial spraying at all.

**RECOMMENDATION:** Please remove aerial spraying, including by drone, from BMPs to protect pollinators and birds.

2. Allowing use near water resources with notification protects nothing. Xerces Society et al call for no application at all within specific buffer areas for public and private drinking water resources. Due to the mobility, accumulation and persistence of neonicotinoid pesticides, water resources must be protected.

**RECOMMENDATION:** Require that the BMPs follow guidance in Xerces et al on observing buffers to water.

3. The Best Management Practices are unenforceable; therefore they must contain stronger, more precautionary language.

LCAR is our court of last resort to protect pollinators in Vermont. Please send the BMPs back to the AIB to get compliance with the law on protection for pollinators and water resources.

Sincerely,  
Marguerite Adelman, Burlington, VT  
Members of the VT PFAS Coalition, VT PAPAN, and the Anthropocene Alliance