

Greetings,

My comments apply to *Proposed Rule 25-P031*.

First I have to ask why it is that the Agricultural Innovation Board is all about rule avoidance and obfuscation rather than enforcement and application per the letter and spirit of passed legislation.

Act 145 is seen as a work-around, much like Act 131 was just a couple years earlier.

Vermonters have no idea how much pesticide is used annually because the AIB, and the VPAC prior to it, did and still do an abysmal job of documenting reported usage, often running 3 or more years behind on annual summary reports.

Avoidance of real pesticide regulation for decades now is absolutely intentional, not simply some failing of an antiquated database or lack of funding. A clear leadership failure.

Next I have to ask what the enforcement provisions are for violations.

I have walked into more than one field and simply scooped up a collection of treated seed.

That's not supposed to happen, but when it does, what then?

Who is in charge of that as an incident response?

And what happens when there is no response, are individual citizens supposed to act as eyes and ears for the Agency of Ag?

These "management practices" are an abomination in more ways than one.

50 foot buffers from water? Completely useless, thanks for nothing.

Anyone who knows anything about protecting water channels / bodies / drainages knows that 200' is a valid minimum buffer distance.

A neo-nic seed ban implementation in 2031? What happened to 2029?

These proposals make the entire legislative process a meaningless run-around.

The guidance on seed and packaging disposal shows just how dis-interested the agency is in any notions of public health protection or rule enforcement.

And all the while, we just keep finding more uses for these chemicals and more ways to jack up their collective potency.

After decades of engagement on the topic of pesticide regulation, I have absolutely zero faith / trust in Vermont's bogus AIB.

Thanks for taking my comment,

Michael Bald

Royalton, VT, where it's wise to filter one's water for PFAS.