

I am a environmental scientist with over 35 years experience developing and implementing policy.

In regards to Rule number 25P031, later this week, 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, regarding 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). However the BMPs as proposed appear inconsistent in major ways with Act 182, 2024 and with current knowledge regarding the impacts (and how best to manage them) of neonics on pollinating insects and bird populations:

1. By allowing aerial spraying of neonics 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 all 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 by Xerces et al. on observing buffers to water.

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

ACTION: LCAR is our court of last resort to protect pollinators in Vermont. Please send the BMPs back to the AIB to address these recommendations and ensure compliance with the law regarding protection for pollinators and water resources from neonic pesticides.

Thank you.

Shannon Cunniff