

I see in the minutes of past VPAC meetings, that VPAC is working on comments to the VAAFM on revisions to the Vermont Pesticide Regulations. I would have been interested to hear the committee's thoughts on how the regulations could be improved, unfortunately, I have not been able to attend many recent VPAC meetings, nor will I be able to make it tomorrow, so I would like to make several comments for you to consider.

- 1) Formalize the role of VPAC in the aerial application permitting process. VPAC is involved in reviewing ROW and Golf course permits and making recommendations to VAAFM. I believe Aerial Application permitting would benefit from VPAC involvement and expertise.
- 2) Pesticide use database maintenance. The VAAFM maintains a database of commercial pesticide use by county, and at one point there was a position attached to this in order to maintain the database. Apparently, funding for this position has been eliminated, consequently the database has errors in it which limit its usefulness. For instance 2,4-D and 2,4-Dichlorophenoxyacetic acid are listed as separate compounds. Both VPAC and the people of Vermont would benefit if someone, knowledgeable in pesticides, were assigned to be staff liaison to VPAC and to maintain the pesticide database, as was the intent when a position was created several years ago.
- 3) Over-the-counter pesticide sales database. I think one of the largest holes in our knowledge of pesticides in Vermont is the fact that we have no information on what homeowners etc. are purchasing and using non-commercially. Pesticide use patterns are constantly changing, without information on what products are being sold to homeowners and in what quantities, we have no way to predict where we might have problems with pesticides approaching toxic levels in our lakes, rivers, and ponds. I would think it would be possible to craft legislation or regulations which would require **large** retailers to submit annual summaries of sales of registered pesticides. Given that most large retailers presumably have computerized inventories, this should not be an undue burden on them.
- 4) The Vermont Legislature has asked VAAFM to undertake a risk assessment of neonicotinoid insecticides in Vermont, with particular reference to honey bee issues. Although this is not part of a re-write of pesticide regulations, this seems to me to be a prime area where VPAC could make use of its widespread knowledge to advise VAAFM. A risk assessment is not a policy issue, but whether some sort of added oversight or limits on neonicotinoid insecticides use in Vermont is appropriate, is an issue which VPAC is well suited to give advice on. Given that VAAFM will be reporting to the legislature on this issue during the upcoming session, it would be timely for VPAC to discuss neonicotinoid use in Vermont.

Thank you for listening.

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