

I have two issues I would like VPAC to consider:

1) Neonicotinoid/insecticide use:

I am concerned by the rapid increase in neonicotinoid insecticide (NI) use in VT and nationally. NI products are now the most commonly used insecticides worldwide. Their chemistry and use is dramatically different from previous insecticides in that they are systemic, water soluble and relatively stable in the environment. The risk is there that these compounds will accumulate in the environment to the extent that water, soil, sediment, and non-target plants will be toxic to not just honey bees, but pollinators in general as well as other terrestrial and aquatic insects. Two use patterns for NI are of particular concern for me. One is the use of these compounds as seed treatments on virtually all conventional corn and soybean crops which leads to large amounts of NI in VT cornfields with the possibility of getting into surface and groundwater. USGS has found NI in up to 75% of streams in the Midwest, most likely from seed treatment use. Up to 91% of wetlands in Canada's prairie pothole region were found to contain NI before planting, again likely due to seed treatment use...in previous years.

The second concern I have about NI use is the large and increasing amount of NI use on ornamental plants in VT. Much of this is presumably on flowering landscape plants by spray, soil drench, or injection. Because these compounds are systemic insecticides, we run the risk of having our flower gardens and landscape plants becoming chronically toxic to pollinating insects. Imidacloprid use has increased dramatically on ornamental plants, according to the VT pesticide use database:

IMIDACLOPRID USE ON ORNAMENTAL/SHADE TREES:

2008: 15 pounds
2009: 134 pounds
2010: 684 pounds
2011: 13,899 pounds
2012: 57,587 pounds

Nov. 13 VPAC minutes state: "current federal strategy prohibits use of all insecticides on plants that are in bloom..." Does this refer only to neonicotinoids? What about homeowner products? The label for: Ortho flower, fruit and Vegetable insect killer (containing acetamiprid) for instance only says it "...is toxic to bees exposed to direct treatment" and "do not apply this product while bees are actively visiting the treated area".

What can we do in VT to ensure that these NI are used ONLY when there is a direct need?

I would like to urge both VAAFM and VPAC to work towards a system where homeowner pesticide use in general and NI in particular can be tracked.

2) Pesticide use database:

I am concerned about the lack of quality control and timeliness of the data in the pesticide use database on the VAAFM web page. Currently the most recent data is from 2012 and it seems to contain many questionable entries such as:

- a. 2,4-D listed separately from 2,4-Dichlorophenoxyacetic acid...sometimes.
- b. MCPP listed separately from Mecoprop
- c. Thifensulfuron methyl listed separately from Thifensulfuron-methyl
- d. No BT used on mosquitoes in 2006?
- e. 120# of atrazine used on mosquitoes in 2007?
- f. 544# of malathion used on mosquitoes in 2009?
- g. 49200# of bifenthrin used for general pest control in 2009?
- h. 394# of glyphosate used in cooling towers in 2010?
- i. 56818# of dazomet used on ornamentals in 2012?
- j. 57587# of imidacloprid used on ornamentals in 2012?

I would like to urge the VPAC to encourage the VAAFM secretary to devote sufficient manpower to ensure that the database is up to date and accurate, as well as being presented in a useable, downloadable form. It is not possible to be aware of pesticide use trends if the data is not timely and accurate.

Thank you for listening,

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