

Neonicotinoid Treated Seed BMP Framework Comments- Ryan Rebozo 11/16/2023

1. Mitigation of potential adverse non-target drift during planting
 - a. I support additional research on seed lubricant alternatives but as a lower priority to other research considerations, primarily potential halo, and legacy effects of nearby or past NTS use on fields.
 - b. i. I support the recommendation with the clarification that the intent is not to reduce pollinator habitat but to reduce mortality caused by pollinators foraging where seed dust has drifted. My suggestion would be to replace “eliminate” with mow as eliminating vegetation is more involved and may trigger the use of herbicides, and mowing is in line with the intent of limiting pollinator foraging during planting. Based on the Corn Dust Research Consortium 2017 handbook, I think we can recommend mowing any flowering herbaceous plants within 50m of the field and make a note that when possible provide a 50m buffer to hedgerows as early flowering tree species are more likely to be attracting pollinators this time of year.
 - ii. I agree with at a minimum notifying bee keepers on site 48hours in advance of planned planting and bee keepers within 2miles when possible.
 - c. Agree with promoting additional education but view developing education on following seed label instructions as a lower priority
2. Preservation of pest management flexibility
 - a. I very much support encouraging seed dealers to provide non-NTS treated seed in any variety sold in VT and maybe we suggest the legislature investigate strategies to leverage the buying power of nearby states (ie: NY if their bill is signed) to further encourage dealers to make these seeds more readily available
 - b. I support providing cost payments for planting non-NTS seed and requiring any crop loss that is covered to be the result of pest pressure that would have been controlled by NTS. Maybe an addition to this could be providing a higher payment to those farms that in addition to planting non-NTS seed also incorporate best tillage practices on their fields
 - c-d. I support these points as written
3. Ecosystem support
 - a. I support the ideas under section 3 with the addition that we should be encouraging the development of pesticide free pollinator habitat using plants native to Vermont.
4. I support the development of guidance materials with the addition of a) including information on the toxicity of neonics to pollinators and higher trophic organisms and their persistence in soil/water b) including the latest information of studies investigating differences in yield between treated and untreated seeds

If we include any type of executive summary or cover letter to accompany the list of recommendations, I would like it to acknowledge-

- 1) the understood toxicity of neonics on non-target insects and organisms up the trophic ladder
- 2) that the studies we reviewed and presenters we invited found no significant difference in corn yield with neonic treated seed vs non-neonic treated seed with the caveat that the potential for legacy or halo effects is not well understood
- 3) Market forces have created conditions where treated seeds have become a cheap form of insurance, and that many of our recommendations are based on functioning within this current framework