

Comments on Section A - Definitions

<i>Commenter</i>	<i>Comments on Chapter 41 - Section A - Definitions</i>	<i>Board Response</i>
Andrew LaVigne, American Seed Trade Association	PIPPs are not restricted or limited use pesticides and no additional state regulations are necessary. The rule is anticompetitive and discriminatory among all sectors of Maine agriculture, and impacts Maine, growers, seed dealers and consumers.	
John Gibson, Biotechnology Industry Organization	Opposed to rules and challenge the Board's legal authority to promulgate such rules. Federal regulation is adequate. Other forms of Bt do not require a license to distribute or use. Support co-existence policy and NOP standards that place onus on organic grower to provide buffers. Bt is already allowed on organic crops.	
Lauchlin Titus, Ag Matters	Has been a part of the Legislature's work group investigating buffers and cross contamination with seed crops (LD 1650). They are recommending a 1% cross contamination level for organic crops. He thinks the Legislature should determine the buffer, not the Board. Does not support licensing requirements for dealers. Wants to strike sections B and CII. Thinks the records are already required and there is no need to have in this rule. Still should require training certificates in order to purchase PIPPs.	
Lebelle Hicks, BPC	Submitted Report of the PIP Technical Committee and Biopesticides Registration Action Document on Bt Plant-Incorporated Protectants.	
Lebelle Hicks, BPC	Listing of all Bt corn products registered throughout US identifying which states register each product also includes labels for the Bt corn products currently registered in Maine.	
Merideth Hall, Writer, Sabattus	Shared buffers a good concept it could be used for other crops, establish largest possible buffer zone you can agree upon, Bt corn reproduces and cannot be recalled like a bottle of pesticide.	
Robert Tardy, Lobbyist, Somerset Associates	Should only have educational requirement, emphasize co-existence, treating Bt corn seed like a restricted use pesticide goes beyond the Board's statutory mandate. Submitted letter signed by 11 alleged organic dairy farmers who think growers can work out the buffers amongst themselves and are concerned they may have to go back to conventional farming and may want to be able to use Bt corn then without all the restrictions. Also submitted letter from many scientists that are concerned about the PNAS article on Bt corn and caddisflies.	

*Commenter**Comments on Chapter 41 - Section A - Definitions**Board Response*

Ron Litterer, President, National Corn Growers Association

Pesticide rules don't apply well to Bt corn because it is not subject to drift, is harmless to non-target pests, and is completely benign to the environment. They encourage grower training, they do not agree that a license is needed since no license is need to plant non-biotech seed that is treated with fungicides and/or insecticides. No need for record keeping, since a corn field will not move and you cannot apply the seed to the wrong area, it doesn't drift and won't spill. See merit in mapping fields as a learning tool in regards to insect resistance management, but do not see how adjacent fields can be mapped as they may not know what will be planted and don't see where 500 feet came from as it is not in Chapter 50. Only need 50 feet to limit cross pollination. Don't see need to record date and time of planting, many growers will not know the EPA Reg. No. of the corn trait in the seed they buy, they will not know the active ingredient of the pesticide protein, there is no benefit to knowing the number corn plants per acre. Although they support training, they do not see a need for special training to handle Bt corn seed.

Russell Libby, MOFGA

Believed that the registration decision was based on having a rule in place before planting. Will ask to rescind registration if no rule is in place. Bt corn is clearly a pesticide. Need to add 500 foot buffer requirement which will mesh with current notification standard. MOFGA prefers the 660 foot buffer as well, also cited two publications that recommend either a two mile or one kilometer buffer. Also would like to see the training required annually. He is also concerned about reports that mid-west farmers are not adhering to the refuge requirements. Wants to make sure a rule is in place before planting.

Tom Cote, Dairy Farmer

Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Vernon Delong, Agricultural Bargaining Council

Rules unfair to the Bt corn grower since the rules for use of sprayed Bt are different. Seed dealers already required to keep records of PIPP sales and make available to the Department of Agriculture. No need for additional rules. MOFGA manual states organic growers must provide their own buffers and if buffers are brought back into the rule there should be an additional hearing.

Comments on Section B - Licenses Required

<i>Commenter</i>	<i>Comments on Chapter 41 - Section B - Licenses Required</i>	<i>Board Response</i>
Andrew LaVigne, American Seed Trade Association	PIPPs are not restricted or limited use pesticides and no additional state regulations are necessary. The rule is anticompetitive and discriminatory among all sectors of Maine agriculture, and impacts Maine, growers, seed dealers and consumers.	
Charles Kojigian and Gail Britton-Kojigian, South China	Require annual licensing for growers, require Bt corn growers to provide a buffer that guarantees 0% cross contamination or consider a moratorium.	
Doug Johnson, Maine Biotechnology Information Bureau	Agrees with sections D and E because the Board should have enough information to make sure IRM requirements are followed. Doesn't think a license should be required for Bt when it is not required for application of Malathion. Cross-pollination is not a problem beyond 10 meters (33 feet) according to German study (abstract submitted). Thinks the grower of a higher value crop should be responsible for any buffer. Also submitted Report of the PIP Technical Committee and Biopesticides Registration Action Document on Bt Plant-Incorporated Protectants.	
Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.	
Jim Crane, Corn Grower, Exeter	Supports co-existence policy. Should not be set buffer. License not required for sprayed Bt so no license should be required for Bt corn. Should rely on seed companies to train and enforce requirements.	
Jim Crane, Crane Brothers – Potato and corn growers	Technology has improved his yields. Doesn't like the record keeping requirements and the license requirement makes no sense to him. Many growers don't have a license. Doesn't think there should be any buffers and Bt corn growers should not be held responsible for any buffers. Farmers can work it out together. Need to make planting decisions now and we should rely on dealers to do the education.	
John Gibson, Biotechnology Industry Organization	Opposed to rules and challenge the Board's legal authority to promulgate such rules. Federal regulation is adequate. Other forms of Bt do not require a license to distribute or use. Support co-existence policy and NOP standards that place onus on organic grower to provide buffers. Bt is already allowed on organic crops.	
Lauchlin Titus, Ag Matters	Thinks the Board should defer some of these decisions to the Legislature and the workgroup convened by the ACF Committee. Sees no justification for licensing based on environmental and human health risks. Seems to be based on protecting markets for identity preserved crops and that is not the BPC's responsibility. It is the responsibility of the grower of that identity preserved crop. He is okay with requiring registrants to report total use to the BPC and to have dealers acquire a general use dealer license, but does not think there is a need for dealers to keep track of who purchased the seed. Agrees that growers should obtain product-specific training certificates to qualify to purchase PIPPs, but thinks registrants should provide the training using materials approved by the Board. Does not think there should be a need for additional training in the future. He agrees with the confidentiality clause in Section F.	

Commenter***Comments on Chapter 41 - Section B - Licenses Required******Board Response***

Lauchlin Titus, Ag Matters

Has been a part of the Legislature's work group investigating buffers and cross contamination with seed crops (LD 1650). They are recommending a 1% cross contamination level for organic crops. He thinks the Legislature should determine the buffer, not the Board. Does not support licensing requirements for dealers. Wants to strike sections B and CII. Thinks the records are already required and there is no need to have in this rule. Still should require training certificates in order to purchase PIPPs.

Logan Perkins, Protect Maine Farmers

Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.

Nancy Allen

Sent article on caddisfly study. Adopt strict rules with large buffer zones next to all waterways and organic growers, certification process for growing Bt corn, independent testing of air, plants and water surrounding any plantings, require Seed companies to do health effect studies on livestock, humans and environment, assessment of Maine plantings by Union of Concerned Scientists annually.

Nicholas Storer, Agricultural
Biotechnology Stewardship Technical
Committee

Support education goal, but don't think dealers or growers need to be licensed. Existing education program works fine. Field sales staff already trained annually. Dealers who do not inform/educate growers about IRM obligations lose their opportunity to sell Bt corn. Growers must sign a contract that obligates them to follow IRM guidelines. Registrants must assess grower adherence with IRM requirements through surveys and farm visits and follow-up on non-compliance as part of a compliance assurance program, must also respond to tips or complaints about non-compliance. Non-compliance leads to loss of privilege to use the technology. Also, US EPA and/or State Lead Agencies have access to these compliance records if agency can demonstrate CBI will be protected.

Robert Tardy, Lobbyist, Somerset
Associates

Should only have educational requirement, emphasize co-existence, treating Bt corn seed like a restricted use pesticide goes beyond the Board's statutory mandate. Submitted letter signed by 11 alleged organic dairy farmers who think growers can work out the buffers amongst themselves and are concerned they may have to go back to conventional farming and may want to be able to use Bt corn then without all the restrictions. Also submitted letter from many scientists that are concerned about the PNAS article on Bt corn and caddisflies.

Commenter***Comments on Chapter 41 - Section B - Licenses Required******Board Response***

Ron Litterer, President, National Corn Growers Association

Pesticide rules don't apply well to Bt corn because it is not subject to drift, is harmless to non-target pests, and is completely benign to the environment. They encourage grower training, they do not agree that a license is needed since no license is need to plant non-biotech seed that is treated with fungicides and/or insecticides. No need for record keeping, since a corn field will not move and you cannot apply the seed to the wrong area, it doesn't drift and won't spill. See merit in mapping fields as a learning tool in regards to insect resistance management, but do not see how adjacent fields can be mapped as they may not know what will be planted and don't see where 500 feet came from as it is not in Chapter 50. Only need 50 feet to limit cross pollination. Don't see need to record date and time of planting, many growers will not know the EPA Reg. No. of the corn trait in the seed they buy, they will not know the active ingredient of the pesticide protein, there is no benefit to knowing the number corn plants per acre. Although they support training, they do not see a need for special training to handle Bt corn seed.

Seth Bradstreet, Commissioner, Maine Department of Agriculture, Food and Rural Resources

Reiterates support of co-existence policy, license requirement for Bt corn is inconsistent since no license is required to purchase or use other Bt formulations, Section C duplicates what's required by 7 MRSA Section 1052(2) which requires dealers to keep records of sales and make those records available to the Department. Section D is redundant, why make farmers keep the same records, defer to the LD 1650 working group to develop BMPs.

Steve Russell, Organic Dairy Farmer, Winslow

Bt corn rules should be strict just like the nutrient management rules. A compromise buffer would be good. Refuge is very important. Better to start with strict rules and loosen them later if we find that is possible.

Tom Cote, Dairy Farmer

Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Vernon Delong, Agricultural Bargaining Council

Rules unfair to the Bt corn grower since the rules for use of sprayed Bt are different. Seed dealers already required to keep records of PIPP sales and make available to the Department of Agriculture. No need for additional rules. MOFGA manual states organic growers must provide their own buffers and if buffers are brought back into the rule there should be an additional hearing.

Walter Fletcher, Dairy Farmer, Pittsfield

Doesn't think a license should be required to plant seed.

Comments on Section C - Dealer Requirements

<i>Commenter</i>	<i>Comments on Chapter 41 - Section C - Dealer Requirements</i>	<i>Board Response</i>
Abi Morrison	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Andrew LaVigne, American Seed Trade Association	PIPPs are not restricted or limited use pesticides and no additional state regulations are necessary. The rule is anticompetitive and discriminatory among all sectors of Maine agriculture, and impacts Maine, growers, seed dealers and consumers.	
Anne Ball, Yarmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Christopher Sewell, Phippsburg	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Clint Giustra, Corn Grower	Rules too burdensome; doesn't like recordkeeping or licensing requirements. Follow science not emotion. Worried the Board will not be able to enforce the rules. Tough regulations will drive the use of the products underground.	
Douglas Wollmar, Trenton	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Elizabeth Jackson, Robbinston	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.	
Flower Noble, Topsham	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	

Commenter**Comments on Chapter 41 - Section C - Dealer Requirements****Board Response**

Gary Fish, BPC	Allow either licensed general use pesticide dealer or a (restricted or limited use) pesticide dealer to distribute PIPPs.
Grace Mueller, Portland	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jaki Erodes, Mt Desert	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jakki Austin, Newport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jean English, Lincolnville	Suggests that records be kept longer than 2 years to help trace health and environmental problems, training should be annual, growers intent to plant PIPPs should be public information to facilitate communication with neighbors, Maps should show PIPPs in relation to other crops within 1 mile, rule should specify buffer distances to susceptible crops that will limit contamination to virtually 0% and should also specify setbacks from bodies of water, UC Davis publication recommends a ½ mile setback distance, in year following planting the Board should require monitoring for volunteer plants and require removal, should require refuges of non-PIPP corn and clarify the size and configuration of the refuge in the rule.
Jeffrey Hotchkiss	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jim Crane, Crane Brothers – Potato and corn growers	Technology has improved his yields. Doesn't like the record keeping requirements and the license requirement makes no sense to him. Many growers don't have a license. Doesn't think there should be any buffers and Bt corn growers should not be held responsible for any buffers. Farmers can work it out together. Need to make planting decisions now and we should rely on dealers to do the education.
John Gibson, Biotechnology Industry Organization	Opposed to rules and challenge the Board's legal authority to promulgate such rules. Federal regulation is adequate. Other forms of Bt do not require a license to distribute or use. Support co-existence policy and NOP standards that place onus on organic grower to provide buffers. Bt is already allowed on organic crops.
Karen D'Andrea, Scarborough	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter***Comments on Chapter 41 - Section C - Dealer Requirements******Board Response***

Katie Boverman, Frammer, Greene

Wants at least a 1 mile buffer. Could be a shared buffer. Must be extensive and detailed records. Her customers have zero tolerance for GMO contamination.

Kim Patnode, Bethel

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Larry Dansinger, Monroe

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Lauchlin Titus, Ag Matters

Has been a part of the Legislature's work group investigating buffers and cross contamination with seed crops (LD 1650). They are recommending a 1% cross contamination level for organic crops. He thinks the Legislature should determine the buffer, not the Board. Does not support licensing requirements for dealers. Wants to strike sections B and CII. Thinks the records are already required and there is no need to have in this rule. Still should require training certificates in order to purchase PIPPs.

Lauchlin Titus, Ag Matters

Thinks the Board should defer some of these decisions to the Legislature and the workgroup convened by the ACF Committee. Sees no justification for licensing based on environmental and human health risks. Seems to be based on protecting markets for identity preserved crops and that is not the BPC's responsibility. It is the responsibility of the grower of that identity preserved crop. He is okay with requiring registrants to report total use to the BPC and to have dealers acquire a general use dealer license, but does not think there is a need for dealers to keep track of who purchased the seed. Agrees that growers should obtain product-specific training certificates to qualify to purchase PIPPs, but thinks registrants should provide the training using materials approved by the Board. Does not think there should be a need for additional training in the future. He agrees with the confidentiality clause in Section F.

Laura Sholtz, Exeter

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Lindsay Sterling, Freeport

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter

Comments on Chapter 41 - Section C - Dealer Requirements

Board Response

Logan Perkins, Protect Maine Farmers	Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.
Mary Cupp, Falmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Michelle Henrion, Local Food Supporter	Wants buffer zone to be as big as justifiable, Free testing of surrounding crops supported by registration fees, keep record for 5 – 10 years with good maps showing where crops were grown. She thought any buffer zone could be split.
Mitch Kihn, Warren	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nancy Chandler, Monmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nancy Kline, Washington	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nell Beer, Ellsworth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nikos Kavanya, FEDCO Seeds	Records should be kept for at least 5 years to help trace cross-contamination, Grower records should include susceptible crops more than 500 feet away as corn can outcross more than 2 miles away and neighbors should be notified in case they are growing a susceptible crop of I they experience health effects from eating contaminated food, growers should report annually, should be required to produce copies of bills and seed bag tags, wants mandatory buffer zones and regulation should stipulate refuge requirements, BPC should inspect crops in field, PIP crops should be labeled, seed savers whose seed is cross-contaminated should be exempted from the rule

Commenter***Comments on Chapter 41 - Section C - Dealer Requirements******Board Response***

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

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Peter Carminati, Stonington

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Prescott McCurdy, Harpsell

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R.L. Chapman, Harpswell

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Rebecca Leathe, Eliot

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Richard Chambers, Orono

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Richard Sawyer, Blue Hill

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Rob Stenger, St George

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Robert MacLeod, Hollis

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Robert Tardy, Lobbyist, Somerset Associates

Should only have educational requirement, emphasize co-existence, treating Bt corn seed like a restricted use pesticide goes beyond the Board's statutory mandate. Submitted letter signed by 11 alleged organic dairy farmers who think growers can work out the buffers amongst themselves and are concerned they may have to go back to conventional farming and may want to be able to use Bt corn then without all the restrictions. Also submitted letter from many scientists that are concerned about the PNAS article on Bt corn and caddisflies.

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Russell Libby, MOFGA

Record keeping rules are appropriate, may make allowances for seed dealers that do not sell pesticides by offering some other type of certification, Support Section D as minimum grower requirements, Want to make training requirement annual, suggest that training include suggestions on how to accommodate requests for buffers and setbacks through the use of refuges (language offered).

Sandra Wachholz, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Selena Craig, Allston, MA

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Seth Bradstreet, Commissioner, Maine Department of Agriculture, Food and Rural Resources

Reiterates support of co-existence policy, license requirement for Bt corn is inconsistent since no license is required to purchase or use other Bt formulations, Section C duplicates what's required by 7 MRSA Section 1052(2) which requires dealers to keep records of sales and make those records available to the Department. Section D is redundant, why make farmers keep the same records, defer to the LD 1650 working group to develop BMPs.

Commenter***Comments on Chapter 41 - Section C - Dealer Requirements******Board Response***

Shep Erhart, Franklin

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Sherry Streeter, Brooklin

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Siu Hin Lee, South Pasadena, CA

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Steve Russell, Organic Dairy Farmer, Winslow

Bt corn rules should be strict just like the nutrient management rules. A compromise buffer would be good. Refuge is very important. Better to start with strict rules and loosen them later if we find that is possible.

Strongheart Loney

Set minimum buffer zone of 660 feet, make records and reports open and reported to the public, burden of notification should be on the Bt corn user.

Tess Woods, Unity

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Tim Libby, Thorndike

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Tom Cote, Dairy Farmer

Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Vernon Delong, Agricultural Bargaining Council

Rules unfair to the Bt corn grower since the rules for use of sprayed Bt are different. Seed dealers already required to keep records of PIPP sales and make available to the Department of Agriculture. No need for additional rules. MOFGA manual states organic growers must provide their own buffers and if buffers are brought back into the rule there should be an additional hearing.

Vikki Rosenbaum, Palm Harbor, FL

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter

Comments on Chapter 41 - Section C - Dealer Requirements

Board Response

Wendy Clark, Falmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Hebb, Nobleboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

William Branigan, Waldoboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Comments on Section D - Grower Requirements

<i>Commenter</i>	<i>Comments on Chapter 41 - Section D - Grower Requirements</i>	<i>Board Response</i>
Abi Morrison	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Andrew LaVigne, American Seed Trade Association	PIPPs are not restricted or limited use pesticides and no additional state regulations are necessary. The rule is anticompetitive and discriminatory among all sectors of Maine agriculture, and impacts Maine, growers, seed dealers and consumers.	
Anne Ball, Yarmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Chrissy Fowler, Teacher and Gardener, Belfast	Wants strong rules. Growers of Bt corn have Rights and Responsibilities. Onus should be on the person using the risky technology. Would like to see the 1 mile buffer or at least 661 feet, burden of notification should be on the Bt corn grower and to require annual training.	
Christopher Sewell, Phippsburg	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Clark Santee	Wants large buffer with onus on Bt corn grower to provide it. Says insect resistance will happen so need to enforce refuges and the refuge can help serve as a buffer.	
Clint Giustra, Corn Grower	Rules too burdensome; doesn't like recordkeeping or licensing requirements. Follow science not emotion. Worried the Board will not be able to enforce the rules. Tough regulations will drive the use of the products underground.	
Douglas Wollmar, Trenton	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Elizabeth Jackson, Robbinston	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.
Flower Noble, Topsham	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Garren Smith, Organic Dairy Farmer, Skowhegan	Wants the 660 foot buffer to prevent cross contamination. Bt corn grower should provide the buffer and should have to retribute the organic grower if there is contamination.
Grace Mueller, Portland	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jaki Erides, Mt Desert	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jakki Austin, Newport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jean English, Lincolnville	Suggests that records be kept longer than 2 years to help trace health and environmental problems, training should be annual, growers intent to plant PIPPs should be public information to facilitate communication with neighbors, Maps should show PIPPS in relation to other crops within 1 mile, rule should specify buffer distances to susceptible crops that will limit contamination to virtually 0% and should also specify setbacks from bodies of water, UC Davis publication recommends a ½ mile setback distance, in year following planting the Board should require monitoring for volunteer plants and require removal, should require refuges of non-PIPP corn and clarify the size and configuration of the refuge in the rule.
Jeffrey Hotchkiss	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jim Crane, Crane Brothers – Potato and corn growers	Technology has improved his yields. Doesn't like the record keeping requirements and the license requirement makes no sense to him. Many growers don't have a license. Doesn't think there should be any buffers and Bt corn growers should not be held responsible for any buffers. Farmers can work it out together. Need to make planting decisions now and we should rely on dealers to do the education.

Commenter**Comments on Chapter 41 - Section D - Grower Requirements****Board Response**

John Gibson, Biotechnology Industry Organization	Opposed to rules and challenge the Board's legal authority to promulgate such rules. Federal regulation is adequate. Other forms of Bt do not require a license to distribute or use. Support co-existence policy and NOP standards that place onus on organic grower to provide buffers. Bt is already allowed on organic crops.
Karen D'Andrea, Scarborough	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Katie Boverman, Framer, Greene	Wants at least a 1 mile buffer. Could be a shared buffer. Must be extensive and detailed records. Her customers have zero tolerance for GMO contamination.
Kim Patnode, Bethel	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Larry Dansinger, Monroe	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Lauchlin Titus, Ag Matters	Has been a part of the Legislature's work group investigating buffers and cross contamination with seed crops (LD 1650). They are recommending a 1% cross contamination level for organic crops. He thinks the Legislature should determine the buffer, not the Board. Does not support licensing requirements for dealers. Wants to strike sections B and CII. Thinks the records are already required and there is no need to have in this rule. Still should require training certificates in order to purchase PIPPs.
Laura Sholtz, Exeter	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Lindsay Sterling, Freeport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Logan Perkins, Protect Maine Farmers	Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Mary Cupp, Falmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Michelle Henrion, Belfast

No longer support sharing of any mandated buffer because the Bt crop can contaminate her organic but not vice versa, small land owners will not have room to provide the buffer, asking for 1 mile buffer, annual training, easy public access to records, notification of neighbors within 1 mile of the crop by Bt corn grower

Michelle Henrion, Local Food Supporter

Wants buffer zone to be as big as justifiable, Free testing of surrounding crops supported by registration fees, keep record for 5 – 10 years with good maps showing where crops were grown. She thought any buffer zone could be split.

Mitch Kihn, Warren

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nancy Chandler, Monmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nancy Kline, Washington

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nell Beer, Ellsworth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nicholas Storer, Agricultural Biotechnology Stewardship Technical Committee

Support education goal, but don't think dealers or growers need to be licensed. Existing education program works fine. Field sales staff already trained annually. Dealers who do not inform/educate growers about IRM obligations lose their opportunity to sell Bt corn. Growers must sign a contract that obligates them to follow IRM guidelines. Registrants must assess grower adherence with IRM requirements through surveys and farm visits and follow-up on non-compliance as part of a compliance assurance program, must also respond to tips or complaints about non-compliance. Non-compliance leads to loss of privilege to use the technology. Also, US EPA and/or State Lead Agencies have access to these compliance records if agency can demonstrate CBI will be protected.

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Nikos Kavanya, FEDCO Seeds

Records should be kept for at least 5 years to help trace cross-contamination, Grower records should include susceptible crops more than 500 feet away as corn can outcross more than 2 miles away and neighbors should be notified in case they are growing a susceptible crop of I they experience health effects from eating contaminated food, growers should report annually, should be required to produce copies of bills and seed bag tags, wants mandatory buffer zones and regulation should stipulate refuge requirements, BPC should inspect crops in field, PIP crops should be labeled, seed savers whose seed is cross-contaminated should be exempted from the rule

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Peter Carminati, Stonington

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Prescott McCurdy, Harpsell

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

R.L. Chapman, Harpswell

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Rebecca Leathe, Eliot

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Richard Chambers, Orono

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Richard Sawyer, Blue Hill

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Rob Stenger, St George

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Rob Stenger, St George

Does not like the co-existence policy, Bt corn growers should be required to notify neighbors, records should not be confidential, GE crop growers should be liable for any cross-contamination or at a minimum neighboring growers should have guaranteed indemnity, Board should consider the effects on aquatic invertebrates.

Robert MacLeod, Hollis

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Robert Tardy, Lobbyist, Somerset Associates

Should only have educational requirement, emphasize co-existence, treating Bt corn seed like a restricted use pesticide goes beyond the Board's statutory mandate. Submitted letter signed by 11 alleged organic dairy farmers who think growers can work out the buffers amongst themselves and are concerned they may have to go back to conventional farming and may want to be able to use Bt corn then without all the restrictions. Also submitted letter from many scientists that are concerned about the PNAS article on Bt corn and caddisflies.

Ron Litterer, President, National Corn Growers Association

Pesticide rules don't apply well to Bt corn because it is not subject to drift, is harmless to non-target pests, and is completely benign to the environment. They encourage grower training, they do not agree that a license is needed since no license is need to plant non-biotech seed that is treated with fungicides and/or insecticides. No need for record keeping, since a corn field will not move and you cannot apply the seed to the wrong area, it doesn't drift and won't spill. See merit in mapping fields as a learning tool in regards to insect resistance management, but do not see how adjacent fields can be mapped as they may not know what will be planted and don't see where 500 feet came from as it is not in Chapter 50. Only need 50 feet to limit cross pollination. Don't see need to record date and time of planting, many growers will not know the EPA Reg. No. of the corn trait in the seed they buy, they will not know the active ingredient of the pesticide protein, there is no benefit to knowing the number corn plants per acre. Although they support training, they do not see a need for special training to handle Bt corn seed.

Russell Libby, MOFGA

Record keeping rules are appropriate, may make allowances for seed dealers that do not sell pesticides by offering some other type of certification, Support Section D as minimum grower requirements, Want to make training requirement annual, suggest that training include suggestions on how to accommodate requests for buffers and setbacks through the use of refuges (language offered).

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Sandra Wachholz, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Selena Craig, Allston, MA

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Seth Bradstreet, Commissioner, Maine Department of Agriculture, Food and Rural Resources

Reiterates support of co-existence policy, license requirement for Bt corn is inconsistent since no license is required to purchase or use other Bt formulations, Section C duplicates what's required by 7 MRSA Section 1052(2) which requires dealers to keep records of sales and make those records available to the Department. Section D is redundant, why make farmers keep the same records, defer to the LD 1650 working group to develop BMPs.

Shep Erhart, Franklin

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Sherry Streeter, Brooklin

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Siu Hin Lee, South Pasadena, CA

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Spencer Aitel, Organic Dairy Farmer

Should add an IPM component to rule and require insect damage threshold before grower can use Bt corn. Using the right hybrid and using rotation will take care of borer and other insect problems.

Steve Russell, Organic Dairy Farmer, Winslow

Bt corn rules should be strict just like the nutrient management rules. A compromise buffer would be good. Refuge is very important. Better to start with strict rules and loosen them later if we find that is possible.

Strongheart Loney

Set minimum buffer zone of 660 feet, make records and reports open and reported to the public, burden of notification should be on the Bt corn user.

Tara Marks, Aspiring farmer, Thorndike

Should be the Bt corn growers' responsibility to notify neighbors before planting a crop. Should be right-to-know.

Commenter***Comments on Chapter 41 - Section D - Grower Requirements******Board Response***

Tess Woods, Unity

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Tim Libby, Thorndike

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Tom Cote, Dairy Farmer

Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Vernon Delong, Agricultural Bargaining Council

Rules unfair to the Bt corn grower since the rules for use of sprayed Bt are different. Seed dealers already required to keep records of PIPP sales and make available to the Department of Agriculture. No need for additional rules. MOFGA manual states organic growers must provide their own buffers and if buffers are brought back into the rule there should be an additional hearing.

Vikki Rosenbaum, Palm Harbor, FL

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Clark, Falmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Hebb, Nobleboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

William Branigan, Waldoboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Comments on Section E - Bt Corn Requirements

<i>Commenter</i>	<i>Comments on Chapter 41 - Section E - Bt Corn Requirements</i>	<i>Board Response</i>
Abi Morrison	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Adam Tomash, W Gardiner	Prefers that we rescind the registration, but in lieu of that mandate LARGE buffer zones (1 mile), mandate that the Bt corn grower and manufacturer are liable for cross-contamination, make planting information publicly available.	
Alan McHughen, Univ of California	PNAS paper is not a study from the National Academy of Sciences, only published in the journal and was not commissioned nor endorsed by the Academy. Consider reports from Ohio and Midwest that show increased yields and decreased pesticide use with Bt corn. Co-existence is not a problem in California.	
Anne Ball, Yarmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
C R Lawn, FEDCO Seeds	Wants to bring back the 660 foot buffer because that is the setback adopted by USDA for seed corn and FEDCO has seen encroachment on their seed corn supplier which was demonstrated in trace GE contamination in 2 out of 3 of his sweet corn varieties and one had that showed 0.01% contamination. FEDCO has zero tolerance for GMO in their seed. Also wants the buffer to be required of the Bt corn grower.	
Charles Kojigian and Gail Britton-Kojigian, South China	Require annual licensing for growers, require Bt corn growers to provide a buffer that guarantees 0% cross contamination or consider a moratorium.	
Charles Kojigian, China	Would like to add a 1 mile buffer. Feels no buffer is adequate.	
Chrissy Fowler, Teacher and Gardener, Belfast	Wants strong rules. Growers of Bt corn have Rights and Responsibilities. Onus should be on the person using the risky technology. Would like to see the 1 mile buffer or at least 661 feet, burden of notification should be on the Bt corn grower and to require annual training.	
Christopher Sewell, Phippsburg	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Clark Santee	Wants large buffer with onus on Bt corn grower to provide it. Says insect resistance will happen so need to enforce refuges and the refuge can help serve as a buffer.	

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Dick Perkins, Dairy Farmer	Rules too restrictive, since very few cases of organic growers juxtaposed with conventional corn grower.
Doug Johnson, Maine Biotechnology Information Bureau	If buffers are added back into the rule, he suggests there be another hearing, because many people did not address the buffer topic in their hearing testimony. He opposes the inclusion of buffers because the Legislature already addressed the issue of out-crossing and together with the Department of Agriculture they support the co-existence policy. Also, requiring Bt corn growers to provide a buffer would be contrary to the USDA National Organic Program requirement that the organic grower provide sufficient buffers to prevent incursion. He also added that buffers to protect seed growers are contrary to The American Seed Trade Association accepted practices. Doug also submitted a statement about the Maine Farm Bureau passing a resolve supporting the use of Bt corn.
Doug Johnson, Maine Biotechnology Information Bureau	Agrees with sections D and E because the Board should have enough information to make sure IRM requirements are followed. Doesn't think a license should be required for Bt when it is not required for application of Malathion. Cross-pollination is not a problem beyond 10 meters (33 feet) according to German study (abstract submitted). Thinks the grower of a higher value crop should be responsible for any buffer. Also submitted Report of the PIP Technical Committee and Biopesticides Registration Action Document on Bt Plant-Incorporated Protectants.
Douglas Wollmar, Trenton	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Elizabeth Jackson, Robbinston	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Ellery Keene, Kennebec County Council of Governments	Thinks whoever is encroaching on an established grower, organic or conventional, should have to provide the buffer. Thought some of this could be controlled at the municipal ordinance level.
Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.
Flower Noble, Topsham	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Galen Larrabee, Dairy Farmer	Thinks neighbors should work out the buffer amongst themselves and have no buffer in the rule.

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Garren Smith, Organic Dairy Farmer, Skowhegan	Wants the 660 foot buffer to prevent cross contamination. Bt corn grower should provide the buffer and should have to retribute the organic grower if there is contamination.
Gary Mullen, Farmer	Believes the person concerned about cross contamination should provide any buffer
Grace Mueller, Portland	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Greg Ponte, Maine Council of Trout Unlimited	Prefer rescinding of registration, but in lieu of that want large buffer zones next to waters to protect invertebrates like caddisflies.
Hillary Lister	Prefers moratorium. 660 feet not a large enough buffer, cannot decontaminate a crop. Concerned about lawsuits against neighbors whose crops are unintentionally cross-contaminated. Need more public participation.
Ingrid Erickson, Orthopedic surgeon	No rule could provide adequate protection. Pollen can drift for up to 30 miles. Suggested setting the buffer at the same level as for pharmaceutical crops which is 1 mile. Wants a moratorium on all GE crops.
Jaki Erodes, Mt Desert	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jakki Austin, Newport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jean English, Lincolnville	Suggests that records be kept longer than 2 years to help trace health and environmental problems, training should be annual, growers intent to plant PIPPs should be public information to facilitate communication with neighbors, Maps should show PIPPs in relation to other crops within 1 mile, rule should specify buffer distances to susceptible crops that will limit contamination to virtually 0% and should also specify setbacks from bodies of water, UC Davis publication recommends a ½ mile setback distance, in year following planting the Board should require monitoring for volunteer plants and require removal, should require refuges of non-PIPP corn and clarify the size and configuration of the refuge in the rule.
Jeffrey Hotchkiss	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jennifer Hughes, S Portland	Concerned about insect resistance and non-target effects

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Jim Crane, Corn Grower, Exeter	Supports co-existence policy. Should not be set buffer. License not required for sprayed Bt so no license should be required for Bt corn. Should rely on seed companies to train and enforce requirements.
Jim Crane, Crane Brothers – Potato and corn growers	Technology has improved his yields. Doesn't like the record keeping requirements and the license requirement makes no sense to him. Many growers don't have a license. Doesn't think there should be any buffers and Bt corn growers should not be held responsible for any buffers. Farmers can work it out together. Need to make planting decisions now and we should rely on dealers to do the education.
Jim Freeman	Wants to have large buffer. 660 feet may not be enough when the Bt corn is planted at the top of a mountain. Onus to provide buffer should be on the Bt corn grower.
Jim Thomas, Farmer from Garland	Wants Bt corn without road blocks and he would be okay with a split buffer.
Jody Spear, Sierra Club, Harborside	Bt corn grower should be required to disclose location and size of plots, training should be annual and should not be done by industry, rescind Bt corn registration in light of new studies and evidence of allergic reactions and reproductive problems.
John Allen, Farmer, Sumner	Wants buffer zones. Government regulation is bad enough doesn't want to be regulated by Monsanto.
John Gibson, Biotechnology Industry Organization	Opposed to rules and challenge the Board's legal authority to promulgate such rules. Federal regulation is adequate. Other forms of Bt do not require a license to distribute or use. Support co-existence policy and NOP standards that place onus on organic grower to provide buffers. Bt is already allowed on organic crops.
Jon Olson, Maine Farm Bureau	Allow co-existence policy to work. Against any set buffer. Rules too inflexible.
Julie Sawtelle, Litchfield	Require GMO growers to accept liability for contamination, no law suits against unintentionally contaminated crops, require comprehensive training on reducing contamination, limit approval of field corn, require substantial buffer zones, prefers moratorium.
Karen D'Andrea, Scarborough	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Katie Boverman, Frammer, Greene	Wants at least a 1 mile buffer. Could be a shared buffer. Must be extensive and detailed records. Her customers have zero tolerance for GMO contamination.
Kim Patnode, Bethel	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Kyla ??	Worried about insect resistance developing. Should only allow GE crops to be grown in indoor clean rooms. Should be public notice in newspapers, should be large buffer and training should not be done by seed dealers.

Commenter**Comments on Chapter 41 - Section E - Bt Corn Requirements****Board Response**

Larry Dansinger, Monroe

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Lauchlin Titus, Ag Matters

Thinks the Board should defer some of these decisions to the Legislature and the workgroup convened by the ACF Committee. Sees no justification for licensing based on environmental and human health risks. Seems to be based on protecting markets for identity preserved crops and that is not the BPC's responsibility. It is the responsibility of the grower of that identity preserved crop. He is okay with requiring registrants to report total use to the BPC and to have dealers acquire a general use dealer license, but does not think there is a need for dealers to keep track of who purchased the seed. Agrees that growers should obtain product-specific training certificates to qualify to purchase PIPPs, but thinks registrants should provide the training using materials approved by the Board. Does not think there should be a need for additional training in the future. He agrees with the confidentiality clause in Section F.

Lauchlin Titus, Ag Matters

Has been a part of the Legislature's work group investigating buffers and cross contamination with seed crops (LD 1650). They are recommending a 1% cross contamination level for organic crops. He thinks the Legislature should determine the buffer, not the Board. Does not support licensing requirements for dealers. Wants to strike sections B and CII. Thinks the records are already required and there is no need to have in this rule. Still should require training certificates in order to purchase PIPPs.

Laura Sholtz, Exeter

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Lebelle Hicks, BPC

Submitted Report of the PIP Technical Committee and Biopesticides Registration Action Document on Bt Plant-Incorporated Protectants.

Lindsay Sterling, Freeport

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Logan Perkins, Protect Maine Farmers

Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Mary Cupp, Falmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Merideth Hall, Writer from Sabattus	Board should be more stringent to help protect smaller farms. Bt corn growers should provide a large buffer. Prefers local governance.
Merideth Hall, Writer, Sabattus	Shared buffers a good concept it could be used for other crops, establish largest possible buffer zone you can agree upon, Bt corn reproduces and cannot be recalled like a bottle of pesticide.
Michelle Henrion, Belfast	No longer support sharing of any mandated buffer because the Bt crop can contaminate her organic but not vice versa, small land owners will not have room to provide the buffer, asking for 1 mile buffer, annual training, easy public access to records, notification of neighbors within 1 mile of the crop by Bt corn grower
Michelle Henrion, Local Food Supporter	Wants buffer zone to be as big as justifiable, Free testing of surrounding crops supported by registration fees, keep record for 5 – 10 years with good maps showing where crops were grown. She thought any buffer zone could be split.
Mitch Kihn, Warren	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nancy Allen	Sent article on caddisfly study. Adopt strict rules with large buffer zones next to all waterways and organic growers, certification process for growing Bt corn, independent testing of air, plants and water surrounding any plantings, require Seed companies to do health effect studies on livestock, humans and environment, assessment of Maine plantings by Union of Concerned Scientists annually.
Nancy Chandler, Monmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nancy Kline, Washington	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Nell Beer, Ellsworth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter**Comments on Chapter 41 - Section E - Bt Corn Requirements****Board Response**

Nicholas Storer, Agricultural
Biotechnology Stewardship Technical
Committee

Support education goal, but don't think dealers or growers need to be licensed. Existing education program works fine. Field sales staff already trained annually. Dealers who do not inform/educate growers about IRM obligations lose their opportunity to sell Bt corn. Growers must sign a contract that obligates them to follow IRM guidelines. Registrants must assess grower adherence with IRM requirements through surveys and farm visits and follow-up on non-compliance as part of a compliance assurance program, must also respond to tips or complaints about non-compliance. Non-compliance leads to loss of privilege to use the technology. Also, US EPA and/or State Lead Agencies have access to these compliance records if agency can demonstrate CBI will be protected.

Nikos Kavanya, FEDCO Seeds

Records should be kept for at least 5 years to help trace cross-contamination, Grower records should include susceptible crops more than 500 feet away as corn can outcross more than 2 miles away and neighbors should be notified in case they are growing a susceptible crop of I they experience health effects from eating contaminated food, growers should report annually, should be required to produce copies of bills and seed bag tags, wants mandatory buffer zones and regulation should stipulate refuge requirements, BPC should inspect crops in field, PIP crops should be labeled, seed savers whose seed is cross-contaminated should be exempted from the rule

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Paul Schlein, BPC

Copy of article from Proceedings of the National Academy of Sciences (PNAS) titled Toxins in transgenic crop byproducts may affect headwater stream ecosystems

Peter Carminati, Stonington

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Prescott McCurdy, Harpsell

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

R.L. Chapman, Harpswell

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Rachael Katz	Wants buffers to guarantee less than 0.01% contamination. At least 1 mile and the buffer should be born proportionally to the amount of land each neighbor has. More land, bigger buffer.
Rebecca Leathe, Eliot	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Ric Mallamo, Belfast	Enact the minimum safeguards requested by MOFGA
Richard Chambers, Orono	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Richard Sawyer, Blue Hill	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Rob Stenger, St George	Does not like the co-existence policy, Bt corn growers should be required to notify neighbors, records should not be confidential, GE crop growers should be liable for any cross-contamination or at a minimum neighboring growers should have guaranteed indemnity, Board should consider the effects on aquatic invertebrates.
Rob Stenger, St George	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Robert MacLeod, Hollis	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Robert Tardy, Lobbyist, Somerset Associates	Should only have educational requirement, emphasize co-existence, treating Bt corn seed like a restricted use pesticide goes beyond the Board's statutory mandate. Submitted letter signed by 11 alleged organic dairy farmers who think growers can work out the buffers amongst themselves and are concerned they may have to go back to conventional farming and may want to be able to use Bt corn then without all the restrictions. Also submitted letter from many scientists that are concerned about the PNAS article on Bt corn and caddisflies.

Commenter**Comments on Chapter 41 - Section E - Bt Corn Requirements****Board Response**

Ron Litterer, President, National Corn Growers Association

Pesticide rules don't apply well to Bt corn because it is not subject to drift, is harmless to non-target pests, and is completely benign to the environment. They encourage grower training, they do not agree that a license is needed since no license is needed to plant non-biotech seed that is treated with fungicides and/or insecticides. No need for record keeping, since a corn field will not move and you cannot apply the seed to the wrong area, it doesn't drift and won't spill. See merit in mapping fields as a learning tool in regards to insect resistance management, but do not see how adjacent fields can be mapped as they may not know what will be planted and don't see where 500 feet came from as it is not in Chapter 50. Only need 50 feet to limit cross pollination. Don't see need to record date and time of planting, many growers will not know the EPA Reg. No. of the corn trait in the seed they buy, they will not know the active ingredient of the pesticide protein, there is no benefit to knowing the number corn plants per acre. Although they support training, they do not see a need for special training to handle Bt corn seed.

Russell Libby, MOFGA

Believed that the registration decision was based on having a rule in place before planting. Will ask to rescind registration if no rule is in place. Bt corn is clearly a pesticide. Need to add 500 foot buffer requirement which will mesh with current notification standard. MOFGA prefers the 660 foot buffer as well, also cited two publications that recommend either a two mile or one kilometer buffer. Also would like to see the training required annually. He is also concerned about reports that mid-west farmers are not adhering to the refuge requirements. Wants to make sure a rule is in place before planting.

Russell Libby, MOFGA

Record keeping rules are appropriate, may make allowances for seed dealers that do not sell pesticides by offering some other type of certification, Support Section D as minimum grower requirements, Want to make training requirement annual, suggest that training include suggestions on how to accommodate requests for buffers and setbacks through the use of refuges (language offered).

Sandra Wachholz, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Scott Vlaun, Norway

Prevent the spread of GE crops, Bt in Bt corn is persistent and may cause pest to become resistant making sprayed Bt ineffective.

Selena Craig, Allston, MA

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Shep Erhart, Franklin

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Sherry Streeter, Brooklin	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Siu Hin Lee, South Pasadena, CA	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Spencer Aitel, Organic Dairy Farmer	Should add an IPM component to rule and require insect damage threshold before grower can use Bt corn. Using the right hybrid and using rotation will take care of borer and other insect problems.
Steve Russell, Organic Dairy Farmer, Winslow	Bt corn rules should be strict just like the nutrient management rules. A compromise buffer would be good. Refuge is very important. Better to start with strict rules and loosen them later if we find that is possible.
Strongheart Loney	Set minimum buffer zone of 660 feet, make records and reports open and reported to the public, burden of notification should be on the Bt corn user.
Tara Marks, Aspiring farmer, Thorndike	Should be the Bt corn growers' responsibility to notify neighbors before planting a crop. Should be right-to-know.
Tess Woods, Unity	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Tim Libby, Organic Farm worker in Dixmont and Charleston	Wants strong rules with at least a 660 foot buffer but 1 mile would be better, very worried about insect resistance because Bt is an important control for organic growers. Should reconsider registration.
Tim Libby, Thorndike	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Timothy Hobbs, Maine Potato Board	NOP requires organic grower to provide buffers so no buffers should be added to the rule.
Tom Cote, Dairy Farmer	Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Commenter***Comments on Chapter 41 - Section E - Bt Corn Requirements******Board Response***

Vernon Delong, Agricultural
Bargaining Council

Rules unfair to the Bt corn grower since the rules for use of sprayed Bt are different. Seed dealers already required to keep records of PIPP sales and make available to the Department of Agriculture. No need for additional rules. MOFGA manual states organic growers must provide their own buffers and if buffers are brought back into the rule there should be an additional hearing.

Vikki Rosenbaum, Palm Harbor, FL

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Clark, Falmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Hebb, Nobleboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

William Branigan, Waldoboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Comments on Section F - Confidentiality

<i>Commenter</i>	<i>Comments on Chapter 41 - Section F - Confidentiality</i>	<i>Board Response</i>
Abi Morrison	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Adam Tomash, W Gardiner	Prefers that we rescind the registration, but in lieu of that mandate LARGE buffer zones (1 mile), mandate that the Bt corn grower and manufacturer are liable for cross-contamination, make planting information publicly available.	
Anne Ball, Yarmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Christopher Sewell, Phippsburg	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Douglas Wollmar, Trenton	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Elizabeth Jackson, Robbinston	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.	
Flower Noble, Topsham	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)	
Garren Smith, Organic Dairy Farmer, Skowhegan	Wants the 660 foot buffer to prevent cross contamination. Bt corn grower should provide the buffer and should have to retribute the organic grower if there is contamination.	

Commenter***Comments on Chapter 41 - Secion F - Confidentiality******Board Response***

Grace Mueller, Portland	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jaki Erodes, Mt Desert	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jakki Austin, Newport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jean English, Lincolnville	Suggests that records be kept longer than 2 years to help trace health and environmental problems, training should be annual, growers intent to plant PIPPs should be public information to facilitate communication with neighbors, Maps should show PIPPS in relation to other crops within 1 mile, rule should specify buffer distances to susceptible crops that will limit contamination to virtually 0% and should also specify setbacks from bodies of water, UC Davis publication recommends a ½ mile setback distance, in year following planting the Board should require monitoring for volunteer plants and require removal, should require refuges of non-PIPP corn and clarify the size and configuration of the refuge in the rule.
Jeffrey Hotchkiss	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Jody Spear, Sierra Club, Harborside	Bt corn grower should be required to disclose location and size of plots, training should be annual and should not be done by industry, rescind Bt corn registration in light of new studies and evidence of allergic reactions and reproductive problems.
Karen D'Andrea, Scarborough	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
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Kim Patnode, Bethel	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Kyla ??	Worried about insect resistance developing. Should only allow GE crops to be grown in indoor clean rooms. Should be public notice in newspapers, should be large buffer and training should not be done by seed dealers.
Larry Dansinger, Monroe	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Lauchlin Titus, Ag Matters	Thinks the Board should defer some of these decisions to the Legislature and the workgroup convened by the ACF Committee. Sees no justification for licensing based on environmental and human health risks. Seems to be based on protecting markets for identity preserved crops and that is not the BPC's responsibility. It is the responsibility of the grower of that identity preserved crop. He is okay with requiring registrants to report total use to the BPC and to have dealers acquire a general use dealer license, but does not think there is a need for dealers to keep track of who purchased the seed. Agrees that growers should obtain product-specific training certificates to qualify to purchase PIPPs, but thinks registrants should provide the training using materials approved by the Board. Does not think there should be a need for additional training in the future. He agrees with the confidentiality clause in Section F.
Laura Sholtz, Exeter	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Lindsay Sterling, Freeport	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Logan Perkins, Protect Maine Farmers	Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.
Mary Cupp, Falmouth	Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)
Michelle Henrion, Belfast	No longer support sharing of any mandated buffer because the Bt crop can contaminate her organic but not vice versa, small land owners will not have room to provide the buffer, asking for 1 mile buffer, annual training, easy public access to records, notification of neighbors within 1 mile of the crop by Bt corn grower

Commenter***Comments on Chapter 41 - Secion F - Confidentiality******Board Response***

Mitch Kihn, Warren

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nancy Chandler, Monmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nancy Kline, Washington

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nell Beer, Ellsworth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Nicholas Storer, Agricultural
Biotechnology Stewardship Technical
Committee

Support education goal, but don't think dealers or growers need to be licensed. Existing education program works fine. Field sales staff already trained annually. Dealers who do not inform/educate growers about IRM obligations lose their opportunity to sell Bt corn. Growers must sign a contract that obligates them to follow IRM guidelines. Registrants must assess grower adherence with IRM requirements through surveys and farm visits and follow-up on non-compliance as part of a compliance assurance program, must also respond to tips or complaints about non-compliance. Non-compliance leads to loss of privilege to use the technology. Also, US EPA and/or State Lead Agencies have access to these compliance records if agency can demonstrate CBI will be protected.

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Paul Drowns, Portland

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Peter Carminati, Stonington

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter***Comments on Chapter 41 - Secion F - Confidentiality******Board Response***

Prescott McCurdy, Harpsell Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

R.L. Chapman, Harpswell Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Rebecca Leathe, Eliot Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Richard Chambers, Orono Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Richard Sawyer, Blue Hill Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Rob Stenger, St George Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Robert MacLeod, Hollis Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Sandra Wachholz, Portland Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Selena Craig, Allston, MA Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter**Comments on Chapter 41 - Section F - Confidentiality****Board Response**

Seth Bradstreet, Commissioner,
Maine Department of Agriculture,
Food and Rural Resources

Reiterates support of co-existence policy, license requirement for Bt corn is inconsistent since no license is required to purchase or use other Bt formulations, Section C duplicates what's required by 7 MRSA Section 1052(2) which requires dealers to keep records of sales and make those records available to the Department. Section D is redundant, why make farmers keep the same records, defer to the LD 1650 working group to develop BMPs.

Shep Erhart, Franklin

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Sherry Streeter, Brooklin

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Siu Hin Lee, South Pasadena, CA

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Strongheart Loney

Set minimum buffer zone of 660 feet, make records and reports open and reported to the public, burden of notification should be on the Bt corn user.

Tess Woods, Unity

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Tim Libby, Thorndike

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Tom Cote, Dairy Farmer

Wants to keep the regulations consistent across the US so Board should not regulate Bt corn. Any buffer should be the responsibility of the person growing the seed or organic crop. The rule overburdens farmers with paper work.

Vikki Rosenbaum, Palm Harbor, FL

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Commenter

Comments on Chapter 41 - Secion F - Confidentiality

Board Response

Wendy Clark, Falmouth

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

Wendy Hebb, Nobleboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

William Branigan, Waldoboro

Ask for 1 mile buffer provided by the transgenic grower, annual training for dealers and growers including information on alternatives to transgenic crops, reporting for both dealers and growers with information available to the public, require Bt corn grower to notify all neighbors within 1 mile radius before planting. (Rights and Responsibilities Form Letter)

General Comments

<i>Commenter</i>	<i>Comments on Chapter 41 - General Comments</i>	<i>Board Response</i>
A. Ingrid Eriksson, Sumner	Submitted Seeds of Doubt: North American farmers' experiences with GM crops, Soil Association	
Adam Tomash, W Gardiner	Prefers that we rescind the registration, but in lieu of that mandate LARGE buffer zones (1 mile), mandate that the Bt corn grower and manufacturer are liable for cross-contamination, make planting information publicly available.	
Alan McHughen, Univ of California	PNAS paper is not a study from the National Academy of Sciences, only published in the journal and was not commissioned nor endorsed by the Academy. Consider reports from Ohio and Midwest that show increased yields and decreased pesticide use with Bt corn. Co-existence is not a problem in California.	
Andrei Alyokhin, Entomologist University of Maine	Submitted manuscript from Galen Dively regarding the caddisfly study published by PNAS.	
Andrew King	Thinks the rule is too restrictive. Too many corn varieties have been traited with Bt so it leaves him few choices.	
Clint Giustra, Corn Grower	Rules too burdensome; doesn't like recordkeeping or licensing requirements. Follow science not emotion. Worried the Board will not be able to enforce the rules. Tough regulations will drive the use of the products underground.	
Dick Perkins, Dairy Farmer	Rules too restrictive, since very few cases of organic growers juxtaposed with conventional corn grower.	
Heidi Ellrich, Alna	Submitted Greenpeace Canada report titled Toxic Corn: Summary of New Scientific Evidence on the Health Dangers Posed by Genetically Engineered Food	
Jean English, Lincolnville	Suggests that records be kept longer than 2 years to help trace health and environmental problems, training should be annual, growers intent to plant PIPPs should be public information to facilitate communication with neighbors, Maps should show PIPPs in relation to other crops within 1 mile, rule should specify buffer distances to susceptible crops that will limit contamination to virtually 0% and should also specify setbacks from bodies of water, UC Davis publication recommends a ½ mile setback distance, in year following planting the Board should require monitoring for volunteer plants and require removal, should require refuges of non-PIPP corn and clarify the size and configuration of the refuge in the rule.	
Jesse Watson, Dad	Follow precautionary principle, the technology is ahead of the regulatory framework. Young farmers will have to deal with the long term consequences so Board should listen to them on this issue.	
Jon Olson, Maine Farm Bureau	Allow co-existence policy to work. Against any set buffer. Rules too inflexible.	
Julie Sawtelle, Litchfield	Require GMO growers to accept liability for contamination, no law suits against unintentionally contaminated crops, require comprehensive training on reducing contamination, limit approval of field corn, require substantial buffer zones, prefers moratorium.	

Commenter***Comments on Chapter 41 - General Comments******Board Response***

Larry Ireland, Corn Grower	Canadian growers can use Bt corn causing a competitive disadvantage for Maine growers.
Lebelle Hicks, BPC	Listing of all Bt corn products registered throughout US identifying which states register each product also includes labels for the Bt corn products currently registered in Maine.
Logan Perkins, Protect Maine Farmers	Those that have the rights should bear the responsibilities, require a 1 mile buffer like pharmaceutical crops, 0.1% contamination level should be okay. Make training annual and add an IPM component to it. Use organic growers as trainers. Have public accessible reporting from dealers and growers, require rotation before allowed to use Bt corn, require Bt corn grower to notify neighbors, 500 feet notice is not enough.
Michelle Henrion, Local Food Supporter	Wants buffer zone to be as big as justifiable, Free testing of surrounding crops supported by registration fees, keep record for 5 – 10 years with good maps showing where crops were grown. She thought any buffer zone could be split.
Nancy Allen	Sent article on caddisfly study. Adopt strict rules with large buffer zones next to all waterways and organic growers, certification process for growing Bt corn, independent testing of air, plants and water surrounding any plantings, require Seed companies to do health effect studies on livestock, humans and environment, assessment of Maine plantings by Union of Concerned Scientists annually.
Nancy Oden, Jonesboro	Rescind Bt corn registration because of health and environmental effects.
Nikos Kavanya, FEDCO Seeds	Records should be kept for at least 5 years to help trace cross-contamination, Grower records should include susceptible crops more than 500 feet away as corn can outcross more than 2 miles away and neighbors should be notified in case they are growing a susceptible crop of I they experience health effects from eating contaminated food, growers should report annually, should be required to produce copies of bills and seed bag tags, wants mandatory buffer zones and regulation should stipulate refuge requirements, BPC should inspect crops in field, PIP crops should be labeled, seed savers whose seed is cross-contaminated should be exempted from the rule
Paul Schlein, BPC	Copy of article from Proceedings of the National Academy of Sciences (PNAS) titled Toxins in transgenic crop byproducts may affect headwater stream ecosystems
Ric Mallamo, Belfast	Enact the minimum safeguards requested by MOFGA
Rob Fish, Food for Maine's Future	Supports strong rules since the Board registered the product contingent on passing rules. Also submitted information on many of the scientists that commented on the caddisfly study in PNAS that Robert Tardy submitted. Rob also submitted Genetic Roulette on behalf of the author Jeffery Smith.
Rob Stenger, St George	Does not like the co-existence policy, Bt corn growers should be required to notify neighbors, records should not be confidential, GE crop growers should be liable for any cross-contamination or at a minimum neighboring growers should have guaranteed indemnity, Board should consider the effects on aquatic invertebrates.
Sue Allen, Mother of soon to be five children	Wants safe and economical food. Wants farmers to be able to compete and wants farmers to have access to Bt corn.

Comments Rescinding Registration

<i>Commenter</i>	<i>Comments on Chapter 41 - Rescind Registration</i>	<i>Board Response</i>
Adam Tomash, W Gardiner	Prefers that we rescind the registration, but in lieu of that mandate LARGE buffer zones (1 mile), mandate that the Bt corn grower and manufacturer are liable for cross-contamination, make planting information publicly available.	
Annie Sheble, Unity	Rescind Bt corn registration.	
Charles Kojigian and Gail Britton-Kojigian, South China	Require annual licensing for growers, require Bt corn growers to provide a buffer that guarantees 0% cross contamination or consider a moratorium.	
Cynthia Pettengill, Wayne	Rescind Bt corn registration.	
Dean Bureau, Grocery Store Owner, Waterville	Doesn't allow GE produce in his store. Very difficult to trace GE contamination. He will not accept produce if there is any question at all. Rescind registration.	
Don Eskelund, Farmer	Submitted the book Seeds of Deception and spoke of an allergic reaction he had to GMO corn.	
Doug Gurian-Sherman, Union of Concerned Scientists	Recommends following precautionary principle. Provided point-counter point on criticism of PNAS caddisfly study.	
Emily Posner, Farmer, Waldo County	Wants highest buffer possible, thinks neighbors have a right-to-know who is growing Bt corn and that there should be reporting to the BPC that is accessible to the public. Also encourages a moratorium.	
Erik Missal	Rescind Bt corn registration.	
Evan Grant, Greene	Rescind Bt corn registration.	
Gene Stewart, Farmer, Winterport	Rescind Bt corn registration.	
Greg Ponte, Maine Council of Trout Unlimited	Prefer rescinding of registration, but in lieu of that want large buffer zones next to waters to protect invertebrates like caddisflies.	
Hillary Lister	Rescind Bt corn registration.	
Hillary Lister	Prefers moratorium. 660 feet not a large enough buffer, cannot decontaminate a crop. Concerned about lawsuits against neighbors whose crops are unintentionally cross-contaminated. Need more public participation.	
Ingrid Erickson, Orthopedic surgeon	No rule could provide adequate protection. Pollen can drift for up to 30 miles. Suggested setting the buffer at the same level as for pharmaceutical crops which is 1 mile. Wants a moratorium on all GE crops.	
Jesse Watson, Dad	Follow precautionary principle, the technology is ahead of the regulatory framework. Young farmers will have to deal with the long term consequences so Board should listen to them on this issue.	

Commenter***Comments on Chapter 41 - Rescind Registration******Board Response***

Jody Spear, Sierra Club, Harborside	Bt corn grower should be required to disclose location and size of plots, training should be annual and should not be done by industry, rescind Bt corn registration in light of new studies and evidence of allergic reactions and reproductive problems.
John O'Donnell, Organic Beef Farmer, Monmouth	Rescind Bt corn registration.
Judi Silver, Waterville	Rescind Bt corn registration.
Julie Sawtelle, Litchfield	Require GMO growers to accept liability for contamination, no law suits against unintentionally contaminated crops, require comprehensive training on reducing contamination, limit approval of field corn, require substantial buffer zones, prefers moratorium.
Kate Ballou, Wayne	Rescind Bt corn registration.
Michelle Russell, Waterville	Rescind Bt corn registration.
Molly Jennings, Windsor	Rescind Bt corn registration. Concerned about food allergies.
Nancy Oden, Jonesboro	Rescind Bt corn registration because of health and environmental effects.
Nancy Reynolds	Rescind Bt corn registration.
Phyllis Capanna, Waterville	Rescind Bt corn registration.
Richard Gabey, W Gardiner	Rescind Bt corn registration.
Russell Libby, MOFGA	Believed that the registration decision was based on having a rule in place before planting. Will ask to rescind registration if no rule is in place. Bt corn is clearly a pesticide. Need to add 500 foot buffer requirement which will mesh with current notification standard. MOFGA prefers the 660 foot buffer as well, also cited two publications that recommend either a two mile or one kilometer buffer. Also would like to see the training required annually. He is also concerned about reports that mid-west farmers are not adhering to the refuge requirements. Wants to make sure a rule is in place before planting.
Storm Waters, Meteorologist, Not from Maine	Be as strict as possible, support organic because it is better at sequestering carbon from the atmosphere. Use precautionary principle.
Taffy Field, Dresden	Rescind Bt corn registration.
Tim Libby, Organic Farm worker in Dixmont and Charleston	Wants strong rules with at least a 660 foot buffer but 1 mile would be better, very worried about insect resistance because Bt is an important control for organic growers. Should reconsider registration.
Walter Isgro	Rescind Bt corn registration.
