

RESPONSE TO COMMENTS—PROPOSED AMENDMENTS TO CHAPTER 41

Person/Affiliation	Summary of Comments	Board Response
<p>Spencer Aitel Two Loons Farm, China</p>	<p><b>Opposes</b> the amendment. He uses IPM at his organic dairy farm and grows his own corn seed. Farming is hard work, there is not enough time to read entire labels; relying on labels is not enough. Farmers are no longer the offspring of farmers, they are not learning from their parents. He is concerned that industry creates products, then, when the product wears out they create a new product. He is also concerned about resistance. He points out that professional farmers get continuing education, that this is not an unusual requirement. We should keep in mind that there are other ways of growing corn than using this product. In response to a question, he said that most farmers are not licensed applicators, they hire out for spraying needs, and so it would not help to incorporate this training with other applicator training.</p>	<p>Acknowledged that not everyone is comfortable with these products. The two year training was intended partly as a way to foster communication and encourage continued discussion amongst groups.</p> <p>Training is valuable, especially for new users. Updates are also important to keep in the forefront of people’s thoughts,</p> <p>Option (1) so the Board decided to retain the two-year refresher training.</p> <p>Option (2) but the Board determined that</p>
<p>Katy Green MOFGA</p>	<p><b>Opposes</b> the amendment. Concerned that new users will not receive training and that there is no way to verify that users are getting the necessary information from dealers or elsewhere. Believes that new technology requires new training. Pointed out that the Commissioner in his opening statements said that it was a good thing that we’re increasing training, but in this amendment we’re talking about eliminating training. Concerned about pesticide resistance which has shown up in the Midwest.</p>	<p>there wasn’t sufficient new information to warrant refresher training every two years, so it extended the retraining interval to [ choose number] years.</p> <p>Option (3) but the board determined that a mandatory requirement wasn’t likely to be any more effective than using an aggressive outreach approach. Consequently it decided to repeal the mandatory refresher training requirement.</p>
<p>Bob St.Peter Food for Maine’s Future</p>	<p><b>Opposes</b> the amendment. He says that <i>Bt</i> corn in Maine is a new development, but, in other parts of the country, there are issues with insect resistance and herbicide-resistant weeds called “super weeds.” He stated that overall pesticide use in the U.S. has increased by nearly 320 million pounds since 1996, when genetically engineered crops became commonly used. The training is important because it gives users technical training, but also because it creates an opportunity for new and experienced users to discuss evolving issues. Provided four articles with supporting information.</p>	

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<p>Lauchlin Titus AgMatters LLC</p>	<p><b>Supports</b> the amendment because most farmers interested in using PIP trait technologies have been through two, two-year cycles of training. This knowledge will continue to transfer through the agricultural community, including through distribution, cooperative extension, private agronomists and amongst growers. Believes BPC inspections have found good compliance with technology use guides and stewardship agreements. Points out that requiring training not required in other states makes Maine a more difficult state in which to do business.</p>	<p>Pointed out that the technical committee would be meeting soon and if certain changes are approved the need for training might be decreased.</p> <p>The Board agrees that if there are no changes to the product then there is probably no need for re-training every two years, however, if new issues emerge than continued training will be important.</p>
<p>Spencer Greatorex Northeast Agricultural Sales, Inc.</p>	<p><b>Supports</b> the amendment because farmers know how to use <i>Bt</i> products and they are diligent about doing the 20% refuge.</p>	<p>Option (1) Ultimately, the Board decided to retain the two-year refresher training.</p>
<p>Justin Choiniere Northeast Agricultural Sales, Inc.</p>	<p><b>Supports</b> the amendment because he believes the industry can ensure that good stewardship is rewarded.</p>	<p>Option (2) Ultimately, the Board determined that there wasn't sufficient new information to warrant refresher training every two years, so it extended the retraining interval to [choose number] years.</p> <p>Option (3) Ultimately, the board determined that a mandatory requirement wasn't likely to be any more effective than using an aggressive outreach approach. Consequently it decided to repeal the mandatory refresher training requirement.</p>
<p>Lauchlin Titus AgMatters LLC</p>	<p>Suggests that Chapter 41, Section 5(B)(II) should be eliminated because the amendment will eliminate Section 5(E) referenced in that paragraph.</p>	<p>The Board feels that requiring sellers to enforce this rule is unfair to them, as that is the Board's responsibility. They are going to suggest changing the rule to eliminate this requirement.</p>

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