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From: Peter Aldridge [mailto:peter@hatchfarm.com]
Sent: Thursday, February 19, 2009 10:29 AM
To: Jennings, Henry
Subject: BPC Meeting, February 20th

Hi Henry

With apologies Debbie and I won't be able to get there tomorrow. The weather has conspired against us, with snow now, rain this afternoon and more snow tonight. Our task tomorrow morning will be digging and plowing, not the trek to Fairfield.

We do have a couple of observations if you get a chance to mention them:

Agenda Item 3, WPS training support.

We remember this item was on the agenda at our very first meeting - so it's a full year now since our stormy relationship with the BPC began. How time flies when you are having fun!

It has been made clear to us, by no less an authority than your own Arthur Shaw, that if we employ field workers within the WPS 30 day window of an application, even an application of an OMRI listed and relatively benign material, it is our responsibility as farmers to provide the requisite safety training for these workers. It seems to us that by subsidizing the Migrant Health Program's WPS training (a worthy goal for sure) the Board is effectively subsidizing migrant workers while Maine resident workers such as the local Washington County people we employ are given no such support. More than that, because in general it's the larger farms with corporate management contracts that employ migrant workers you are in effect subsidizing large farms at the expense of small family enterprises. We don't think that's a fair use of the State's money.

If the Board were to go ahead with this I believe they should set aside some fraction of the funds available to be used as grants towards the training costs of small farmers. Doing so would also provide a modest incentive to family farms to provide training even for family members who they are not obliged to train under WPS rules.

Agenda Item 10 (d) - the Precautionary Principle

I was alerted to this issue by the news that "The co-op" (The Cooperative Wholesale Society Ltd., www.co-operative.coop) was taking a precautionary stance with respect to neonicotinoids and bees (their "Plan Bee, <http://www.co-operative.coop/ethicsinaction/takeaction/planbee/>)

The Precautionary Principle, at least with respect to pesticides, in essence states that the onus is on those promoting the use of the material to provide the science to prove it safe. This is the opposite of our current situation, where the onus is on those who are concerned about potential harm to provide the science to prove the harm. We had a good example of how this works when bees were last discussed some months ago, when Labelle told us about the potential synergistic effects of neonicotinoids and some anti-fungals, which may, in combination, be extremely harmful to bees. She told us that the EPA refuses to even think about combination testing, so a potentially harmful situation is allowed to continue until someone else provides the science one way or another. So the question for the Board is - should they adopt the precautionary principle in respect to future registration decisions, or are they happy to continue to allow unquantified risk while investigations continue?

We hope you have a good meeting, and again we are sorry we cannot be there.

Sincerely,

2/24/2009

Peter & Deborah

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