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June 9, 2011

Henry Jennings, Director
Maine Board of Pesticides Control
State House Station 28
Augusta, ME 04333

Mr. Jennings:

I am writing to respectfully request that the Board of Pesticides Control consider amending Chapter 41 to eliminate the Bt Plant Pesticide Protectant (PIP) training requirement. I understand from a recent communication with you that this is a major substantive rule change that will require approval from the legislature. It seems like appropriate timing to begin work on this subject this summer so that the question, if approved by the BPC, may be brought before the next legislative session.

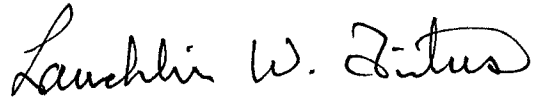
The training requirement has been in place long enough so that the vast majority of farmers interested in using PIP trait technologies have been through two of the training and certification cycles (two year cycle). Numerous farmers have used the technologies since they have been allowed in Maine and are certainly more knowledgeable about the various requirements such as Insect Resistance Management (IRM), refuge areas, and destruction of the crop residue in the case of sweet corn. This knowledge transfers through the agricultural community in many ways--grower meetings, personal discussion between growers, from seed dealers, and consultants. In addition, I understand that BPC staff have inspected most, if not all, of the farms that have used these traits and found compliance with the technology use guides and stewardship agreements required by the manufacturers to be very good. I do not dispute that the required training has been beneficial in this regard. The manufacturers, distribution chain, seed dealers, cooperative extension personnel, and private agronomists also provide a high level of ongoing training to interested growers. I believe that the BPC may now rely upon these folks to provide this ongoing training along with updates of new traits and technologies that may be approved for use in Maine in the future and repeal the training requirement found in Chapter 41.

Lastly, this training requirement is one small example of how Maine is a state that is more difficult to do business in than others. It adds another step to the sale and delivery of corn seed that takes time and energy on the part of seed dealers to verify that Maine farmers have a current BPC Bt certificate. It certainly takes time and energy on the part of the farmers to obtain repetitive training on a topic that they are familiar with. And of

course it takes time and energy on the part of the BPC staff that could possibly be utilized in other areas that may have a more positive impact on the public good.

If you and the BPC Chair agree to include this in an upcoming agenda I will plan to attend the meeting to address any questions the Board members and Staff may have regarding this request. I have noted the proposed July and August dates for BPC meetings and will plan to leave those dates open until I hear from you.

Sincerely yours,

A handwritten signature in black ink that reads "Lauchlin W. Titus". The signature is written in a cursive, flowing style.

Lauchlin W. Titus