

RESPONSE TO COMMENTS—PROPOSED AMENDMENTS TO CHAPTER 41

Person/Affiliation	Summary of Comments	Board Response
<p>Spencer Aitel Two Loons Farm, China</p>	<p>Opposes 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>The Board 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, but the Board determined that there wasn’t sufficient new information to warrant refresher training every two years, so it extended the retraining interval to three years.</p>
<p>Katy Green MOFGA</p>	<p>Opposes 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>Bob St.Peter Food for Maine’s Future</p>	<p>Opposes 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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Lauchlin Titus AgMatters LLC	Supports 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.	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 three years.
Spencer Greatorex Northeast Agricultural Sales, Inc.	Supports the amendment because farmers know how to use <i>Bt</i> products and they are diligent about doing the 20% refuge.	
Justin Choiniere Northeast Agricultural Sales, Inc.	Supports the amendment because he believes the industry can ensure that good stewardship is rewarded.	
Lauchlin Titus AgMatters LLC	Suggests that Chapter 41, Section 5(B)(II) should be eliminated because the amendment will eliminate Section 5(E) referenced in that paragraph.	The Board reasoned that requiring sellers to enforce this rule is unfair to them, as that is the Board's responsibility. The Board decided to change the rule to eliminate this requirement.